

PSJ10 Exh 11

Memorandum

Subject

Distributor Briefing with Actavis Elizabeth, LLC
(RK0146806), on September 12, 2012

(DFN:601.04.2)

Date

NOV 05 2012

To

Joseph T. Rannazzisi
Deputy Assistant Administrator
Office of Diversion Control

From

Barbara J. Boockholdt
Barbara J. Boockholdt, Chief
Regulatory Section, ODG
Office of Diversion Control

On September 12, 2012, a meeting was held in Arlington, Virginia at the Drug Enforcement Administration (DEA) Headquarters between DEA and Actavis Elizabeth, LLC (Actavis). Representing Actavis were: Nancy Baran, Director, Customer Service, Jason Chung, DEA Manager, John S. Kaldes, Senior Director Engineering & EHS, Michael R. Clarke, Ethics & Compliance Officer, Americas, and Doug Plassche, Managing Director, NJ Solid Oral Dose (SOD). Representing DEA were: Barbara J. Boockholdt, Chief, Regulatory Section; Staff Coordinator (SC) Leonard Levin, Regulatory Section; Dedra Curteman, Office of Chief Counsel, Jason Hedges, Office of Chief Counsel; Christine Sannerud, Chief, Quota Section; Stacy Harper-Avilla, Chief, Quota Unit; GS Andrew Breiner, and D/I Michael Smilek, both from the Newark Division Office. The purpose of the meeting was to address the manufacturing and distribution practices of controlled substances by Actavis. SC Levin stated he would only concentrate on oxycodone 15mg and 30mg tablets for the purposes of this meeting. Actavis holds the following DEA Registrations: RK0146806 (Manufacturer, NJ), R0146818 (Distributor, NJ), RB0185579 (Manufacturer, NC), RA0231062 (Manufacturer, FL), RA0419552 (Manufacturer, NJ), RA0419540 (Distributor, NJ), and RA0395675 (Manufacturer, NJ).

SC Levin opened the meeting by stating its purpose was both educational and informative. SC Levin stated he would discuss Actavis' responsibilities under the Controlled Substances Act (CSA), their suspicious order monitoring system, their procedures concerning due diligence, knowing their customers, who their customers sell to, and graphs depicting the pharmacies where their products were ultimately dispensed from. SC Levin stated he would be primarily focusing on the distribution of oxycodone 15mg and 30mg tablets by Actavis. SC Levin asked for a representative from Actavis to talk briefly about the firm, their product line, their suspicious order monitoring system and to whom they distribute. Ms. Baran spoke on behalf of Actavis. Ms. Baran stated that Actavis manufactures non-controlled and controlled substances from their locations in New Jersey, North Carolina and Florida. Actavis' corporate offices are located in New Jersey. Ms. Baran stated that as of November 1, 2012, Watson Pharmaceuticals will acquire Actavis and the firm will have a new name. Ms. Baran stated both Actavis and Watson will be applying for new DEA registrations. Watson was not invited to this meeting per Actavis because the acquisition has not yet taken place. Ms. Baran stated Actavis sells some products directly to distributors, but the bulk of their finished products are sent to UPS Supply Chain, which serves as a fulfillment center

for orders placed with Actavis. Ms. Baran stated Actavis remains the owner of the controlled substances while in the possession of UPS Supply Chain. Ms. Baran stated that UPS Supply Chain has their own suspicious order monitoring system. Almost all of Actavis' controlled substances are sent to the UPS Supply Chain location in Louisville, KY. Actavis ships the order to UPS Supply Chain for processing and distribution. Actavis is the owner of the inventory, not UPS Supply Chain. UPS Supply Chain uses their own DEA registration and reports purchases and sales directly to ARCOS. Ms. Baran explained their charge back system. The system enables Actavis to see who their customers are selling their products to and what they are purchasing. Ms. Baran stated that Actavis is just beginning to review their sales through the charge back system. Ms. Baran stated she has visited UPS Supply Chain and been able to review their suspicious monitoring system. UPS Supply Chain has a staff which monitors any suspicious orders of controlled substances. Value Centric is a firm who stores sales data for Actavis which they can review. Recently, Ms. Baran has gone out to visit their large volume customers, such as Cardinal, McKesson and AmerisourceBergen. SC Levin mentioned to Ms. Baran the significance of "Knowing Your Customers". SC Levin stated that the United States (U.S.) consumes more legitimately manufactured controlled drugs than any other country. SC Levin mentioned that 97 percent of hydrocodone that is manufactured is prescribed and dispensed in the United States. SC Levin explained the dramatic increase of prescription drug abuse, which has increased by 400 percent over the past 10 years. SC Levin stated that today more people are abusing prescription medication than are abusing illicit drugs. The abuse of prescription drugs has become a national epidemic.

SC Levin presented a PowerPoint presentation exemplifying the common characteristics and issues associated with the distribution and manufacturing practices by manufacturers and distributors of controlled substances. SC Levin stressed the importance of a manufacturer's due diligence requirements, knowing one's customers, and the detection of suspicious orders. Specifically reviewed were the following:

- Supreme Court Cases and Immediate Suspension Orders
- Closed System of controlled substance distribution
- Establishing the medical necessity for a prescription and/or a distribution to be legal
- The DEA Internet Policy and the Ryan Haight Act
- Policies published by the American Medical Association (AMA) and the Federation of State Medical Boards (FSMB)
- Review of Suspicious Order requirements of Title 21, Code of Federal Regulations
- Knowing one's customer
- Theft and loss reporting
- Recent News Articles regarding actions taken against CVS pharmacies, Cardinal and Walgreens
- System to insure the address, controlled substance schedules and expiration date of customers' DEA registrations prior to shipping them controlled substances
- Recent actions taken by the DEA to suspend or revoke controlled substance registrations of distributors and pharmacies that continue to divert controlled substances into the illicit market

At the conclusion of the PowerPoint Presentation, SC Levin presented graphs documenting the distribution of oxycodone 15mg and 30mg tablets by Actavis Elizabeth, LLC. These distributions were derived from ARCOS reports submitted by Actavis under specific NDC numbers. The graphs revealed a dramatic increase in the sale of oxycodone 15mg and 30mg tablets from 2010 to present with the vast majority being distributed to Florida. The graphs did show a decrease in the amounts of oxycodone distributed in the past six months. SC Levin attributed the decrease to actions taken by DEA in Florida,

the Florida prescription monitoring program, administrative action taken by DEA against registrants and meetings such as this one. Chief Boockholdt explained that the manufacturer that produces oxycodone is just as responsible as the distributor and pharmacy for ensuring that these drugs do not end up in the wrong hands. SC Levin thoroughly discussed the problems associated with pain management clinics in Florida, which has directly attributed to the abuse and the diversion of oxycodone. Chief Boockholdt stated that addicts are coming from around the country to Florida and are specifically seeking oxycodone 15mg and 30mg tablets. Chief Boockholdt stated that in Florida eleven people per day are dying from oxycodone overdoses and seven babies are born each day addicted to opiates. SC Levin discussed the red flags associated with physicians prescribing at pain management clinics and the pharmacies who filled the prescriptions, such as, controlled versus non-controlled drugs, trends in purchasing, types of drugs purchased, quantity of drugs purchased, hours of operation, mainly cash customers, etc. Chief Boockholdt stated that ARCOS data revealed the [REDACTED] was distributing very large quantities of Actavis oxycodone 15mg and 30mg to numerous pharmacies in Florida. Some of the pharmacies had purchased well in excess of a million dosage units per year. This is an obvious concern to DEA and must be addressed by Actavis.

The graphs were broken down by year and included 2010, 2011, and the first six months of 2012. The graphs revealed that Actavis' oxycodone 15mg. and 30mg tablets are distributed throughout the country, but more is distributed in Florida than almost all of the other states combined. The problem is especially bad in South Florida, specifically Miami Dade, Broward and Palm Beach Counties. Chief Boockholdt stated that Florida's prescription drug laws have traditionally been very lax and because of that and the influx of pain management clinics oxycodone sales went out of control. Chief Boockholdt mentioned that because of the amount of oxycodone prescriptions being written, Florida, specifically South Florida has more pending pharmacy applications than all other states combined. Statistics are now showing this problem is spreading north into Georgia, Tennessee, Kentucky, Ohio and West Virginia. SC Levin stated one of the purposes of this meeting is to bring the wholesaler or manufacturer on board to be part of the solution, rather than contribute to the problem.

SC Levin showed graphs of oxycodone shipped by UPS Supply Chain to the distributors and to the distributors' customers. SC Levin advised Ms. Baran that Actavis should send someone from their compliance team to visit pharmacies who were receiving their products in south Florida, in order for them to witness the long lines at pain clinics, out of state license plates, questionable clients, security guard(s) in the parking lots, and signs stating cash payment only. SC Levin and Chief Boockholdt stressed to Ms. Baran and the other Actavis representatives to get to know their customers, visit distribution sites, visit customers of those distributors, check on customers' suspicious order monitoring systems, review due diligence files, and obtain printouts of pharmacies or practitioners who are receiving Actavis products.

Ms. Baran stated Actavis has only recently begun looking at the pharmacies that purchase their products and wants to be involved in working to resolve this problem. SC Levin stated that if their customers refused to provide them with sales information Actavis should consider cutting them off. Chief Boockholdt suggested Actavis determine the percentage of their products being shipped into Florida. SC Levin inquired about the two NDC numbers for both oxycodone 15mg and 30mg tablets in 2011. Ms. Baran stated that two of Actavis NDC numbers was terminated in 2011 and replaced by the two new ones. SC Levin again mentioned the [REDACTED] Ms. Baran stated that [REDACTED] distribution centers purchase oxycodone from Actavis. SC Levin suggested representatives of Actavis travel to some of the distribution sites, especially the one in [REDACTED], to review their suspicious order monitoring systems. A review of [REDACTED] pharmacies purchases of Actavis products is important. The charts shown at this briefing revealed that some [REDACTED]

pharmacies were purchasing in excess of 20 times the national average of oxycodone. SC Levin pointed out that [REDACTED] in Delaware are owned by [REDACTED] and dispense large quantities of oxycodone. Chief Boockholdt mentioned that any manufacturer's quota request is based on anticipated need and the fact that the majority of prescriptions dispensed in Florida were not legitimate show that Actavis' quota may be too high. SC Levin asked the representatives from Actavis to take serious look at their quota request, review their suspicious order monitoring system, visit their customers to review their suspicious order monitoring systems as well as their due diligence files, ask to see their customers' top customers for Actavis products, and contact their local DEA Office with any questions or issues. Ms. Baran stated that their sales force has been informed to keep management abreast of what is going on in the field. SC Levin mentioned that sales people are generally on commission and may not be objective when it comes to their accounts purchasing suspicious or unusual orders of controlled substances.

Ms. Baran said that Actavis will do whatever it takes to remain in compliance with the CSA. Ms. Baran stated she will take this information back to Actavis corporate headquarters and begin thoroughly reviewing charge back information, as well as the other data bases. Ms. Baran stated Actavis Compliance personnel plan to visit more of Actavis' customers to review their due diligence records and suspicious order monitoring systems. Ms. Baran stated Actavis wants to ensure to the best of its ability that their products are being properly monitored by Actavis and their customers.

SC Levin explained that the purpose of this meeting was to inform, educate, provide pertinent ARCOS data, discuss national trends, and discuss the pain management epidemic in Florida involving oxycodone. DEA is seeking to partner with drug distributors and manufacturers in resolving this problem. SC Levin did state that if Actavis or any firm who had been briefed was found to have violated the CSA pertaining to what was discussed during the course of this meeting DEA could seek administrative or civil action to remedy the situation. Chief Boockholdt advised the representatives from Actavis that all employees who have access to controlled substances at Actavis should receive training similar to that provided at this meeting today.

SC Levin asked if there were any questions. There were none. The meeting between the Drug Enforcement Administration and Actavis Elizabeth, LLC was concluded.

Attachments:

1. PowerPoint presentation
2. Graphs of Actavis Elizabeth, LLC ARCOS sales/purchases

cc: GS Andrew Breiner, Newark Division Office

This presentation does not cover the totality of your obligations nor is it a substitute for your obligations as a DEA registrant under The Controlled Substances Act and its Regulations.

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The information presented should not be considered new information. The substance of this presentation has been previously available and communicated through The Controlled Substances Act, its Regulations, Federal Register Notices, DEA and sponsored conferences, correspondence from the DEA, releases from the popular press, in addition to the Registrant's own sales data.

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Closed System

- ☐ The comprehensive Drug Abuse Prevention and Control Act of 1970, as amended in 1990 and 1994 created a system for the legitimate manufacturing, distribution, and prescribing/dispensing of controlled substances.
- ☐ Each registrant within this “closed system of distribution” has defined privileges and responsibilities in which they must operate.

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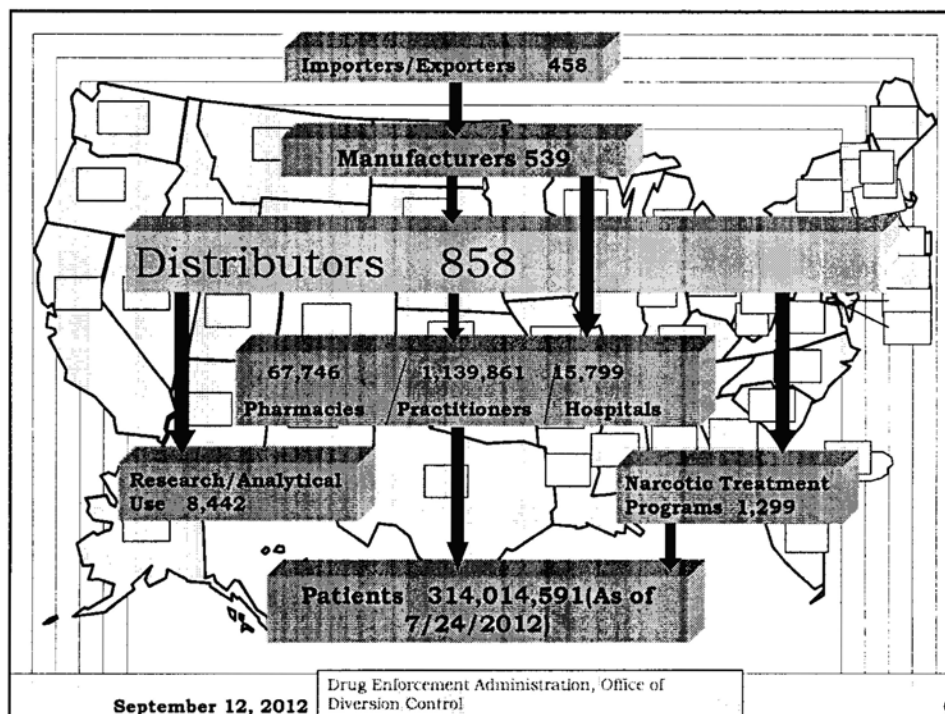
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Closed System

- ☐ When a registrant fails to adhere to their responsibilities, those violations represent a danger to the public and jeopardize the “closed system of distribution”.
- ☐ DEA is responsible for the oversight and integrity of the system and to protect the public.

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Supreme Court Cases

☐ **Direct Sales Co, Inc. v. United States (1943)**

- Mail order sales to doctor
- Most sales were morphine
- Increase in quantities purchased
- Business practices attracted customers who were violating the law
- Drugs have inherent susceptibility to harmful and illegal use

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Supreme Court Cases

☐ **United States v. Moore (1975)**

- Usual course of professional practice
 - ☐ Patient with a Medical Complaint
 - ☐ History
 - ☐ Physical Examination
 - ☐ Nexus Between Complaint/History/Exam and Drug Prescribed

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RESPONSIBILITIES

Distributor Responsibilities

- 21 USC, Section 823
 - ☐ Is the registration in the public interest?

Maintenance of Effective Controls

- Against diversion of particular controlled substances into other than legitimate medical channels

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Responsibilities

Pharmacy Responsibilities:

- 21 USC, 823
 - Compliance with applicable State, Federal, or local laws relating to controlled substances,
 - Such other conduct which may threaten the public health and safety
- 21 CFR, 1306.04(a):
 - A corresponding responsibility rests with the pharmacist who fills the prescription

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Responsibilities

Practitioner Responsibilities:

- 21 USC 823
 - Compliance with applicable State, Federal, or local laws related to controlled substances
 - Such other conduct which may threaten the public health and safety
- 21 CFR 1306.04(a)
 - A prescription for a controlled substance to be effective must be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice

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Ryan Haight Act

- ☐ MUST be approved prior to any online dispensing. ONLY a previously registered pharmacy who DEA approved with a modification of registration may be an online pharmacy
- ☐ A DEA registered pharmacy that is approved to conduct online dispensing MUST notify DEA and the state boards of pharmacy in all states in which they conduct business 30 days prior to offering a controlled substance to sell, deliver, distribute, or dispense

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Ryan Haight Act

- ☐ An online pharmacy MUST comply with all state laws from which and to which they deliver, or dispense, or offer to deliver or dispense controlled substances by means of the Internet
- ☐ A VALID prescription for a controlled substance by means of the Internet MUST be for legitimate medical purpose and have at least one in-person medical examination by a practitioner authorized by DEA and respective State authorities to prescribe controlled substances in that controlled substance schedule

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Pain & Other Specialties

- ☐ Pain Management
Organizations have established guidelines which suggest treatment is not exclusive to the administering of controlled substances only
- ☐ There must be a balance between pain and addiction

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Pain & Other Specialties

Recognized Modalities for the Treatment of Pain:

- ☐ Pharmacotherapy
- ☐ Psychosocial Interventions
- ☐ Rehabilitation Techniques
- ☐ Complementary & Alternative Medicine
- ☐ Implantable Devices & Surgical Interventions

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Pain & Other Specialties

- ☐ Three Pain Management Associations recommend “Opioid Guidelines”
- ☐ Guidelines provide recommended procedures and best practices for a practitioner to implement
- ☐ Not an endorsement by the DEA. A guide for you to assess your customers.

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Suspicious Orders

21 CFR 1301.74

- ☐ Requires that registrants design and operate a system to identify suspicious orders
- ☐ Report suspicious orders to DEA **when discovered**

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Suspicious Orders

Reporting of a suspicious order to DEA does NOT relieve the distributor of the responsibility to maintain effective controls against diversion

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Suspicious Orders

- ☐ DEA cannot advise a distributor if an order is legitimate or not.
- ☐ Distributor must determine which orders are suspicious and make their OWN decision to sell or not to sell

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DUE DILIGENCE

“KNOW YOUR CUSTOMER”

Prior to filling an order the distributor should review the following:

- ☐ Unusual frequency of order(s),*
- ☐ Unusual size of order(s),*
- ☐ Deviating substantially from a normal pattern *

* Mandated by 21 CFR, 1301.74(b)

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DUE DILIGENCE

- ☐ **Range of Products Being Purchased,**
- ☐ **Methods of Payment (cash, insurance, Medicaid),**
- ☐ **Location and hours of operation,**
- ☐ **% Controlled vs. % Non-Controlled,**
- ☐ **Customer pick up at distributorship**

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DUE DILIGENCE



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Notifications

- ☐ Theft and Loss – Report immediately via on-line.
- ☐ Contact your local field office.
- ☐ ODGR – Regulatory Unit – (202) 307-7161
- ☐ **ODG@USDOJ.GOV** – Notification of termination of customers for cause. (No explanation required.)

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Actions Taken by DEA

Southwood Pharmaceuticals, Inc.

- ☐ 72 FR 36,487 (2007)
 - Revocation of Registration
 - Immediate Suspension Order
 - ☐ Failure to maintain effective controls against diversion
 - ☐ Supplied millions of dosage units of controlled substances to Internet pharmacies
 - ☐ Failure to exercise due diligence (21 USC 823)

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Actions Taken by DEA

Ladapo O. Shyngle, M.D.

- ☐ 72 FR 6056 (2009)
 - Revocation of Application to renew registration
 - Dr. Shyngle prescribed C/S's via an Internet questionnaire and telephone interviews.
 - Prescribed over 500,000 d.u. to patients in 41 states.
 - Issued prescriptions primarily for hydrocodone.

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Actions Taken by DEA

Dale L. Taylor, M.D.

□ 72 FR E7-10622 (2007)

- Revocation of registration.
- Authorized prescriptions via the Internet, based solely on on-line questionnaire and telephone conversations.
- Authorized 6,069 prescriptions to 1,098 patients in 46 different states.
- 5,156 prescriptions were for hydrocodone and 526 were for alprazolam.

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Actions Taken by DEA

United Prescription Services

□ 72 FR 50397 (2007)

- Immediate Suspension Order and revocation of registration.
- United Prescription Services operated several Internet sites.
- Between Oct 2005 – Jan 2006, distributed 1,808,693 d.u. More than 1,275,000 were written by one practitioner.
- Mostly written for hydrocodone and alprazolam.

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Actions Taken by DEA

Patrick W. Stodola, M.D.

- 74 FR 20727 (2009)
 - Revocation of Registration.
 - Authorized prescriptions based upon an on-line questionnaire and telephone conversations.
 - Prescriptions were for hydrocodone.
 - Prescriptions were in violation of state laws where the patients were having them filled.

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Actions Taken by DEA

Bob's Pharmacy & Diabetic Supplies

- 74 FR 19599 (2009)
 - Immediate Suspension Order and Revocation of Registration.
 - Between Apr – Dec 2007, ordered 2.3 million dosage units of hydrocodone products.
 - Prescriptions were approved via an on-line questionnaire.

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SUMMARY

- ☐ Prescriptions not written in the usual course of professional practice are not valid.
- ☐ Drugs dispensed pursuant to invalid prescriptions are not for legitimate medical purpose, the drugs are being diverted.
- ☐ Not limited to Internet pharmacies.

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SUMMARY

- ☐ A pattern of drugs being distributed to pharmacies who are diverting controlled substances demonstrates the lack of effective controls against diversion by the distributor
- ☐ The DEA registration of the distributor could be revoked under public interest grounds

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SUMMARY

- ☐ Any Distributor who is selling controlled substances that are being dispensed outside the course of professional practice must stop immediately
- ☐ DEA cannot guarantee that past failure to maintain effective controls against diversion will not result in action against a distributor

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SUMMARY

- ☐ DEA will:
 - Meet with other distributors
 - Provide this information to your employees at your request
 - Meet with Industry groups or associations to discuss issue as requested

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SUMMARY

www.deadiversion.usdoj.gov

- Current Revocation Actions
- Policy Changes
- Validation of Registration
- Links to web sites with useful information (AMA, Pain Management, Pharmacy, etc.)
- Other

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NEW DATA REVEAL 400% INCREASE IN SUBSTANCE ABUSE TREATMENT ADMISSIONS FOR PEOPLE ABUSING PRESCRIPTION DRUGS
White House Bulletin

WASHINGTON - Today, Gil Kerlikowske, Director of National Drug Control Policy (ONDCP), and Thomas McLellan, Deputy Director of ONDCP, joined Peter Daltany, Director of Substance Abuse and Mental Health Services Administration's (SAMHSA) Office of Applied Studies, and Michele M. Leonhart, Acting Administrator of the Drug Enforcement Administration (DEA), to release a new study showing a 400 percent increase in substance abuse treatment admissions for prescription pain relievers. Governor Jack Markell of Delaware and Chris Kennedy Lawford were also in attendance.

The study, Substance Abuse Treatment Admissions Involving Abuse of Pain Relievers 1998-2008, conducted by the SAMHSA, and based on the agency's Treatment Episode Data Set (TEDS) reveals a 400 percent increase between 1998 and 2008 of substance abuse treatment admissions for those aged 12 and over reporting abuse of prescription pain relievers. The increase in the percentage of admissions abusing pain relievers spans every age, gender, race, ethnicity, education, employment level, and region. The study also shows a more than tripling of pain reliever abuse among patients who needed treatment for opioid dependence.

"The TEDS data released today highlights how serious a threat to public health we face from the abuse of prescription drugs", said Gil Kerlikowske, National Drug Policy Director. "The spikes in prescription drug abuse rates captured by this study are dramatic, pervasive, and deeply disturbing."

"The non-medical use of prescription pain relievers is now the second-most prevalent form of illicit drug use in the Nation, and its tragic consequences are seen in substance abuse treatment centers and hospital emergency departments throughout our Nation" said SAMHSA Administrator Pamela S. Hyde, J.D. "This public health threat demands that we follow the President's National Drug Control Strategy's call for an all-out effort to raise awareness of this risk and the critical importance of properly using, storing, and disposing of these powerful drugs."

"The data released today is alarming and shows the tremendous damage being caused by prescription drug abuse all across this country each and every day," said DEA Acting Administrator Michele M. Leonhart. "The effective enforcement of laws regulating the distribution of controlled substances, coupled with their lawful disposal are essential parts of a comprehensive strategy to reduce drug abuse. DEA is committed to being part of the solution, however it will take all of us working together to prevent the tragedies that inevitably come with drug abuse."

"This rise in prescription drug abuse is no surprise to the doctors and law enforcement professionals who see its effects in our communities," said Governor Markell. "We have been focused on making sure that health care professionals have the best tools

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available to detect and prevent this kind of abuse before it ruins lives. Delaware's new legislation to authorize a prescription monitoring program is one of those tools and an important component of the President's National Drug Control Strategy."

"Our national prescription drug abuse problem cannot be ignored. I have worked in the treatment field for the last 35 years, and recent trends regarding the extent of prescription drug abuse are startling," said A. Thomas McLellan, Deputy Director of ONDCP. "We must work with prescribers, the pharmaceutical industry, law enforcement, and families to help us fight this scourge."

The National Drug Control Strategy, released in May, outlines several steps to address what Director Karlikowski calls "the fastest-growing drug problem in the United States"—prescription drug abuse.

They include

- * Increasing prescription drug return, take-back, and disposal programs. Prescription drugs that are commonly abused are often found in the family medicine cabinet, and individuals should get rid of unused or expired prescription drugs to prevent diversion and abuse.
- * Educating physicians about opiate painkiller prescribing. The Administration's FY 2011 Budget request proposes funding for a program to train prescribers on how to instruct patients in the use and proper disposal of painkillers, to observe signs of dependence, and to use prescription drug monitoring programs to detect when an individual is going from doctor to doctor in search of prescriptions (also called "doctor shopping").
- * Expanding prescription drug monitoring programs. Currently, these programs are operating in 34 states. The Administration supports establishment of these programs in every state, and is seeking to ensure new and existing monitoring programs effectively use the data they acquire and share information across state lines.
- * Assisting states in addressing doctor shopping and pill mills. Criminal organizations have established thriving businesses of transporting people to states with little regulation to obtain prescription drugs from multiple doctors or from pill mills, which distribute drugs indiscriminately. Federal, state, local, and tribal authorities are working together to address this problem.
- * Driving illegal Internet pharmacies out of business.
- * Cracking down on rogue pain clinics that do not follow appropriate prescription practices.

The National Drug Control Strategy provides a blueprint for reducing prescription drug abuse. Parents, law enforcement, the medical community, and all levels of government have a role to play in reducing prescription drug abuse.

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Later today, Director Karlikowski will travel to Delaware to attend Governor Markell's bill signing for the Delaware Prescription Drug Monitoring Program.

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U.S. can stop some drug sales at 2 CVS stores: judge

Tue Mar 13 2013

WASHINGTON (Reuters) - The U.S. Drug Enforcement Administration can stop two CVS Caremark Corp. pharmacies from selling potentially addictive drugs in a case involving suspected prescription drug abuse, a federal judge ruled on Tuesday.

U.S. District Judge Reggie Walton vacated a temporary restraining order that had blocked the Drug Enforcement Administration (DEA) from acting against the two Florida stores independent of selling abuse of the powerful oxycodone outside legitimate channels.

Walton stayed his ruling until 4:30 p.m. (1500 GMT) on Wednesday to give CVS Caremark attorneys time to appeal. But the company appealed later on Tuesday. Further details were not immediately available.

CVS Caremark had asked the judge to require a preliminary injunction that could have blocked the DEA from taking action until an administrative law judge decides the matter later this year.

Walton said he could find no reason to believe the CVS argument that DEA had acted in an "arbitrary and capricious" manner in ordering sales suspended or that extended steps taken for CVS were sufficient.

"We are disappointed with today's ruling," CVS said in a statement. "Regardless of today's outcome, we remain committed to working with the DEA to do everything we can to reduce prescription drug abuse."

The litigation stems from the DEA's battle against prescription drug abuse, which has surged in the United States to epidemic levels of more than 17 million Americans abuse pharmaceuticals made with controlled substances for purposes not related to medicine and that Florida is the center of the growing epidemic.

The federal agency cited state statistics showing a 168 percent increase in overdose deaths reported to hospitals from 2006 to 2011, and an average 11 deaths per day from oxycodone, hydrocodone, hydrocodone/acetaminophen or morphine.

In a case related to the CVS ruling, Walton last month allowed the DEA to suspend Cardinal Health Inc.'s license to distribute controlled substances from a Florida facility that serves about 2,700 drug stores or hospitals.

The ruling was later blocked temporarily by a U.S. appeals court. Walton said he expected the appeals court to take the same action on CVS.

The CVS stores are two of four Cardinal customers that DEA has said were inappropriately filling prescriptions for oxycodone.

A CVS attorney said the company had stopped oxycodone sales at the two pharmacies. But a state Department of Health and suspicious sales had involved other controlled substances.

The DEA charged that between January 2008 and December 2011 the two CVS stores purchased amounts of oxycodone far in excess of normal pharmacy volumes, ignored DEA warnings and addressed the issue only after the DEA acted.

A CVS attorney told the court that the volumes were not out of line for high-volume pharmacies that maintain 24-hour service and argued that retailer steps taken by CVS had eliminated any immediate danger to the community by the time the DEA ordered sales suspended in February.

The case is *Holiday CVS LLC v. Justice Department*, No. 12-00191.

(Reporting by David Milam; Editing by Gary Holt)

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DEA: Oxycodone orders by pharmacies 20 times average USA Today.com

Two Florida CVS pharmacies ordered more than 3 million oxycodone pills in 2011, more than 20 times higher than the national average, DEA agents said Monday.

As part of a crackdown on rampant painkiller abuse in Florida, the Drug Enforcement Administration charged a major health care company and two CVS pharmacies in Sanford, Fla., with violating their licenses to sell the powerful pain pills and other drugs.

"It's an tremendous amount, way beyond what would be for legitimate use," said Mark Trouville, DEA special agent in charge of the Miami Field Division. "We're not talking about a gray area here."

The average pharmacy in the United States ordered about 60,000 oxycodone pills in 2011, the DEA said. The two CVS pharmacies, located less than 6 miles apart, ordered 3 million.

It is the first time the DEA has suspended the license of a chain pharmacy in Florida for its alleged role in the state's prescription drug abuse problem, Trouville said. The DEA had previously targeted pain clinics known as "pill mills" where rogue doctors prescribe thousands of pain pills with only cursory examinations.

"This is absolutely not the end of the investigation," Trouville said. "We know when we hit the pill mills that pharmacies would be the next issue. We just didn't know chain pharmacies would get into it."

CVS said it took steps with DEA's knowledge to stop filling prescriptions from doctors thought to be prescribing improperly.

"We informed a small number of Florida physicians that CVS pharmacy will no longer fill the prescriptions they write for Suboxone or Naloxone," spokeswoman Carolyn Castel said in a written statement. "Distributions of oxycodone to the two Florida stores have decreased by approximately 80% in the last three months compared to the prior three months -- we believe in large part due to our action."

On Friday, the DEA on suspended Cardinal Health's controlled substances license at its Lakeland, Fla., distribution center after linking it to high-volume orders of pain pills to four Florida pharmacies, including the two in Sanford. The distribution center services 2,500 pharmacies in Florida, Georgia and South Carolina.

A federal judge temporarily halted the suspension after Cardinal said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 13 in Washington, D.C.

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Cardinal CEO George Barrett called the DEA action a "chaotic overreaction" and said the company has "extensive processes" to prevent diversion of its pharmaceuticals for illegitimate use. Cardinal's internal controls have flagged more than 100 pharmacies in Florida and 350 pharmacies nationwide for "suspicious order patterns," he said.

"The needs of pharmacies are varied, and higher volumes can be appropriate based on a number of factors, including pharmacy size, hours of operation, patient demographics and proximity to hospital and surgery centers, nursing homes, cancer clinics and hospice providers," Cardinal said in a statement.

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DEA moves against two Florida pharmacies, distributor over pill sales CNN.com

(CNN) -- Agents from the Drug Enforcement Administration raided two CVS pharmacies in central Florida over the weekend, removing controlled substances and suspending the stores' ability to handle or distribute drugs such as painkillers oxycodone and hydrocodone.

The DEA said that during one year, the two pharmacies -- both in Sanford, Florida -- ordered more than 3 million oxycodone units from a pharmaceutical wholesaler, which is typical pharmacy orders to 600.

"Each registrant (pharmacy) was filing prescriptions far in excess of legitimate needs of its customers," said DEA Special Agent in Charge Mark Trouvillat during a press conference Monday in central Florida.

The DEA also has suspended the controlled substance license of the wholesale distributor, Cardinal Health of Lakeland, Florida, according to Trouvillat.

"Cardinal Health did not fulfill its due diligence to ensure controlled substances were not diverted into other than legitimate channels," Trouvillat said.

On Friday, Cardinal Health filed and received an emergency injunction from a federal judge in Washington allowing the drug supplier to continue filling orders for other pharmacies.

"We believe the DEA is wrong," said Cardinal Health Chairman and CEO George Barrett in a written statement.

"We strongly disagree with the allegations the DEA has made against our facility and intend to vigorously challenge this action," said Barrett.

The two Sanford pharmacies remain open filling regular prescriptions but they cannot fill prescriptions for controlled substances such as oxycodone, one form of which is the well-known narcotic OxyContin.

CVS said in a written statement that the company is disappointed by the DEA actions but is fully cooperating with the DEA suspension.

"CVS pharmacy is unwavering in its compliance with and support of the measures taken by federal and state law enforcement officials to prevent drug abuse and keep controlled substances out of the wrong hands," said CVS spokesman Mike DeAngelis.

Hearings on the suspensions will be held but no date has been set.

Trouvillat said that since the state of Florida moved to crack down on "pill mills" by banning doctors from directly distributing controlled narcotics, pharmacy sales of controlled substances have skyrocketed.

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DEA agents raid CVS pharmacies

By AMELIA R. HERNANDEZ
Staff Writer

Federal drug authorities raided two CVS stores in Broward County on Wednesday, removing boxes of medications and other materials from the pharmacies.

CVS spokesman, Michael DeAngelis, said the raid was related to action a day earlier by the Drug Enforcement Agency against Cardinal Health, which has a drug distribution center in Lakeland.

The DEA tried to suspend the license of Cardinal Health in order to stop the company from shipping drugs such as morphine and hydrocodone from the Lakeland center. But a judge later had DEA order.

Two statements released Friday, Cardinal, a billion dollar pharmaceutical company, said it distributes drugs to more than 2,500 pharmacies in the Southwest, including four pharmacies listed in the DEA order, that are accused of filling prescriptions for patients other than for legitimate medical reasons.

Agents on Saturday first raided the CVS pharmacy at 3700 N. University Blvd. in Hollywood, and then returned later to another CVS pharmacy at 2500 W. Flamingo in Oakland.

About a dozen DEA agents worked five hours at each location, packaging items from behind the pharmacy counter while CVS employees stood behind the counter.

CVS spokeswoman said about 100 prescriptions were seized at the pharmacies.

We are disappointed that the DEA has taken this action, but we are confident in our compliance with the law and our commitment to patient care.

The raid came amid aggressive action by the DEA against businesses accused of dispensing inappropriate prescriptions for powerful pain killers and anti-anxiety drugs.

Cardinal Health said it has cooperated with the agency and has returned shipments to the pharmacies. It said it has not received any notice from the DEA.

CVS said it has not received any notice from the DEA. It said it has not received any notice from the DEA.

CVS also defended its record, describing its compliance with state and federal law enforcement as "exemplary" in order "to ensure the safety of our patients and the integrity of our business."

More than two months ago, the company sent a letter to a small group of pharmacies asking them to stop filling prescriptions for patients who were not in pain.



CVS pharmacy in Lakeland, Fla., is one of the pharmacies that the DEA has accused of filling prescriptions for patients other than for legitimate medical reasons.

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2A MONDAY, FEBRUARY 6, 2012 USA TODAY

DEA charges 2 Fla. pharmacies in pill mill probe

Drug wholesaler also under investigation

By Dennis L. Hernandez
USA TODAY

Federal authorities have expanded their crackdown on pill mill abuse, charging a major health care company and two CVS pharmacies in Florida with violating state laws on controlled substances.

The Drug Enforcement Administration (DEA) said it is investigating the company for allegedly high shipments of controlled drugs to four pharmacies.

On Friday, the DEA suggested Cardinal Health, a controlled substance wholesaler in Lakeland, Fla., distributed drugs to four pharmacies in Florida, Georgia and South Carolina.

A federal judge previously based the charges on the same day after Cardinal, a \$1.3 billion company, said it would stop supplying the drugs to the four pharmacies. A hearing on the suspension order was set for Feb. 13 in Washington, D.C.

The action comes as the DEA is cracking down on pill mills — rogue doctors and shady pharmacies that divert the highly addictive pain pills, such as morphine, to drug dealers.

This is the first time the DEA has charged a wholesaler with diverting controlled substances.

CVS said Saturday that it had taken steps to stop the wholesaler from supplying controlled substances to the pharmacies.

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Cardinal Health settles drug distribution case
U.S. Today
 May 16, 2012

The DEA suspended Cardinal Health, the country's second largest drug distributor, from selling and shipping powerful painkillers and other drugs from its Lakeland, Fla., facility for two years as part of a settlement reached Tuesday.

The Drug Enforcement Administration sought to revoke Cardinal's license on February 1, accusing the company of selling excessive amounts — more than 12 million oxycodone pain pills — to four Florida pharmacies over three years. The DEA said the company did not report suspicious orders or visit the chain pharmacies that purchased large amounts of the drugs.

The DEA also suspended controlled substances licenses for two CVS pharmacies in Sanford, Fla., which purchased millions of oxycodone pills from Cardinal. A judge is expected to rule on the CVS case this month.

"Cardinal Health is not above the law," said Joe Rinnocicci, DEA deputy assistant administrator. "With this agreement, it admits that it neglected its vital responsibility to prevent the diversion of controlled substance medications."

While the agreement resolves the licensing issue, the DEA said it may pursue civil penalties, including fines, against the company. The Dublin, Ohio-based company had revenue of more than \$100 billion in 2011.

This is the second time the DEA has taken action against Cardinal. In 2008, Cardinal paid a \$34 million fine after the DEA accused it of shipping excessive amounts of hydrocodone, another powerful painkiller, to Internet pharmacies. As part of that settlement, the DEA suspended licenses at three distribution facilities for a year.

Cardinal admitted Tuesday it had "inadequate" control over some of its controlled drugs and had not fully complied with the 2008 agreement.

"This agreement allows us to put this matter behind us, and just as important, will clear the way for a more productive dialogue about how we and others in the health care and regulatory community can work together to prevent the abuse and misuse of prescription drugs," Cardinal CEO George Barrett said.

The five-year agreement applies to all 28 of Cardinal's distribution facilities and requires the company to review orders for the controlled drugs, visit pharmacies to look for signs of diversion and hire extra field inspectors for Florida pharmacies.

The Lakeland facility can still distribute non-controlled drugs and medical supplies.

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Cardinal Plant Can't Ship Pain Pills

Wall Street Journal

A U.S. appeals court ruled Friday that a Cardinal Health Inc. distribution hub in Florida can't ship prescription painkillers while the drugmaker battles a Drug Enforcement Administration move to suspend that facility's license.

While the appeals court recently issued a stay of the DEA's enforcement efforts against Cardinal's Lakeland, Fla., facility, the court Friday said Cardinal hasn't met the "stringent" requirements for an injunction. The decision means the Lakeland facility can't ship controlled substances until the appeal is sorted out.

Cardinal, based in Dublin, Ohio, said it utilized contingency plans earlier this month "and will continue to endeavor to meet our customers' needs with minimal disruption from our other distribution centers."

The contingency plans involve shipping controlled drugs to customers in the Southeast U.S. from alternative facilities in Mississippi or North Carolina. Analysts have said the plans could add transportation costs to Cardinal and delay deliveries.

The suspension of the DEA license means the Lakeland facility is barred from shipping controlled medications like the pain drug oxycodone to thousands of pharmacies, hospitals and other health care providers. Cardinal, the nation's No. 2 drug distributor by sales after McKesson Corp., can still ship noncontrolled medications, which include most prescription drugs, and supplies such as surgical packs.

The DEA also suspended last month the controlled-substance licenses of four Florida pharmacies, including two owned and operated by CVS Caremark Corp. CVS, was a temporary administrative stay on Wednesday to keep dispensing controlled medications after an appeals court denied the pharmacy chain's request for a preliminary injunction.

The DEA took action against the Lakeland facility last month while accusing Cardinal of not doing enough to stop oxycodone abuse. Cardinal has said that it supports the DEA's efforts but also charged that it wasn't doing enough.

A U.S. District Court judge ruled in late February that the government acted properly in trying to cut off shipments of oxycodone from the Lakeland site. Cardinal appealed that ruling in the U.S. Court of Appeals for the District of Columbia Circuit.

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DEA searches Fla. Walgreens in painkiller probe

CURT ANDERSON, AP Legal Affairs Writer
Updated 3:01 p.m., Friday, April 6, 2012

MIAMI (AP) — Federal drug agents have searched six Walgreens pharmacies and a company distribution center in Florida as part of an investigation into prescription painkiller drug abuse, U.S. Drug Enforcement Administration officials said Friday.

The distribution center in Jupiter and the six pharmacies — two in Fort Pierce and one each in Hudson, Port Richey, Fort Myers and Oviedo — all showed signs of suspiciously high distribution of the highly addictive drug oxycodone, a DEA investigator wrote in an affidavit for the search warrants.

Such large amounts, investigator Marjorie Milan wrote, indicates "a pharmacy that fills prescriptions issued by physicians at pain clinics and/or a pharmacy which services primarily drug-seeking individuals who abuse the medication."

The searches for pharmacy records conducted Wednesday are the latest in a crackdown by federal and state authorities on "pill mills" and other illegal sources of prescription drugs in Florida, which has become the nation's leading source of oxycodone and similar drugs. The DEA says that prescription drug abuse now exceeds abuse of all illegal drugs combined, except marijuana.

Michael Polzin, a spokesman for Deerfield, Ill.-based Walgreens, said it is cooperating in the investigation.

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Earlier this year, the DEA moved to suspend the sale of similar controlled substances at two CVS pharmacies in the Orlando area, and the shipment of them from Cardinal Health Inc.'s Lakeland, Fla.-based center that supplied the stores. A federal appeals court recently upheld those suspensions.

DEA records cited in the Walgreens affidavit show sharp increases in oxycodone purchases at each of the locations. For example, the pharmacy in Fort Myers went from selling 95,860 units of oxycodone in 2009 to more than 2.1 million units in 2011 — good for 67 percent of all the oxycodone purchased by pharmacies in that same zip code in 2011.

In the first two months of this year, the DEA added, 53 Walgreens pharmacies are listed in the agency's top 100 purchasers of oxycodone. In 2009, none were on the list.

Earlier this year, the DEA released figures showing that Florida may be losing its distinction as the nation's leading illicit source for painkillers because of the ongoing law enforcement crackdown and several new laws. Florida also last year began operating a prescription drug tracking system and database aimed at combating illegal diversion of the drugs.

About 85 people, including at least 13 doctors, have been arrested in South Florida over the past year on pill mill-related charges, according to federal prosecutors.

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The DEA's prescription drug policy saves many lives.
Wall Street Journal
By: Peter Hensinger and Robert L. DuPont

Scott Gottlieb's "The DEA's War on Pharmacies—and Pain Patients" (op. ed., March 23) hardly tells the true story of prescription drug abuse and the government's response. In the current Cardinal Health case, the Drug Enforcement Administration discovered numerous oxycodone transactions that greatly exceeded the "suspicious order" criteria in the law and were not halted or reported to the DEA. Cardinal Health was fined \$34 million in 2008 for similar violations.

Last July, the Florida legislature declared a public-health emergency—not because of a shortage of medicine, but because of increased overdose deaths caused by prescription opioids. Last year 25 distributors provided over 570 million dosage units of oxycodone in Florida alone, with Cardinal Health accounting for 25%.

Dr. Gottlieb thinks transferring DEA's responsibilities to the FDA would be a good idea, yet the FDA's record when it comes to regulating controlled substances is not good. In 1996, DEA asked FDA to schedule Somax (carisoprodol), a muscle relaxant abused by opiate addicts. In 2009, 13 years later, the FDA granted permission to schedule the drug. In 2004, the DEA asked the FDA to reschedule hydrocodone products (Vicodin, Lortab, etc.). The FDA responded four years later but did not agree to tighten the controls on what continues to be America's most frequently prescribed opioid associated with significant overdose deaths. A bill currently in Congress, if passed, will accomplish this long overdue action.

Prescription-drug overdose deaths now exceed U.S. motor-vehicle fatalities. The only federal agency that has confronted the unlawful diversion of these drugs is the DEA. Shifting regulatory control from the DEA to the FDA would accomplish nothing, but would add to the problem.

The DEA represents the unspoken interests of tens of thousands of victims harmed or killed each year by prescription drug abuse. The DEA's enforcement actions in Florida are clearly in the public interest, and its regulatory authority should not be diminished, but strongly supported.

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Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	BF100628	FOOD CITY PHARMACY #74	KNOX	KNOXVILLE	TN	37819	245,000
2	AB924497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	213,400
3	FH063247	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	194,400
4	BH943698	HEPZIBAH	HILLSBOROUGH	TAMPA	FL	33612	177,300
5	BE481274	EXPRESS SCRIPTS	BUCKS	BENSALEM	PA	19020	168,300
6	BT748594	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIOCH	TN	37013	160,000
7	BJ367466	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	148,000
8	FJ106039	K SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	146,900
9	BS245458	SAFESCRIPIT PHARMACY #6	CABELL	HUNTINGTON	WV	25701	145,400
10	AW028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32906	138,000
11	FH116167	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	136,100
12	BW587284	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	127,900
13	FS061783	SANDLAKE PHARMACY	ORANGE	ORLANDO	FL	32819	126,400
14	BE113126	ESI MAIL PHARMACY SERVICE	MARICOPA	TEMPE	AZ	85284	125,400
15	BW164870	WALGREEN CO.	SEMNOLE	CASSELBERRY	FL	32730	125,300
16	AW136637	WALGREEN CO.	LEE	FORT MYERS	FL	33907	124,100
17	BP477742	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	117,400
18	BH9244728	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	15642	110,200
19	BO9831657	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	108,700
20	BH976028	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19761	103,400
21	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	101,100
22	BW0133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	99,600
23	BW9039804	WALGREEN EASTERN CO., INC.	STRAFFORD	ROCHESTER	NH	03867	99,000
24	FW0277823	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	96,900
25	FP106764	PERRY DRUG INC.	JOHNSON	LENEXA	KS	66216	97,400
26	BW9810879	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819	96,500
27	FU1700812	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605	94,700
28	BW5837591	WALGREEN CO.	MLWAUKEE	MLWAUKEE	WI	53222	94,500
29	BH9874410	HAPPY HARRY'S INC.	SUSSEX	LEWES	DE	19958	93,400
30	BH9792013	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234	91,600
31	AW6020941	WALGREEN CO.	MANATEE	BRADENTON	FL	34206	90,600
32	AE1893274	ELK PHARMACY INC	SURRY	ELKIN	NC	28621	89,300
33	BL4229616	LOVELACE OUTPATIENT PHARMACY	BERNALILLO	ALBUQUERQUE	NM	87108	89,800
34	BH9874161	HAPPY HARRY'S INC.	NEW CASTLE	NEWARK	DE	19713	89,700
35	AW9423880	MANOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	87,800
36	AW9020528	WALGREEN CO.	MANATEE	LAKE WORTH	FL	33407	85,300
37	BH9876216	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19966	86,000
38	DE4824217	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	85,700
39	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	84,300
40	BP2146236	PHARMCORE INC	BROWARD	HALLANDALE	FL	33009	82,600
41	AB7118254	TRU-VALUE DRUGS	PALM BEACH	LAKE WORTH	FL	33409	82,600
42	FW0994847	WALGREEN CO.	ORANGE	WINTER PARK	FL	32789	82,200
43	BW5661970	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34962	82,000
44	BW9643013	WALGREEN CO.	ASHTABULA	ASHTABULA	OH	44004	81,700
45	AG0389238	P & S PHARMACY	SULLIVAN	KINGSPORT	TN	37660	81,600
46	FW4223912	WALGREEN CO.	MATANUSKA-SUBITNA	FAIRBANKS	AK	99701	81,400
47	BH9874923	HAPPY HARRY'S INC.	SUSSEX	MILLSBORO	DE	19964	81,200
48	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDAL	AZ	85308	80,400
49	BW7169184	WALGREEN CO.	SALT LAKE	SALT LAKE CITY	UT	84118	79,400

Top 80 Pharmacies Sales of Oxycodone 30mg (NDC 62162-0216-02) 2019							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	B0700028	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	1,360,800
2	B0375448	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309	1,079,100
3	B04577630	GENERIC-DEPOT #2 INC	BROWARD	FORT LAUDERDALE	FL	33321	979,400
4	F01644328	GENERIC DEPOT 3, INC	BROWARD	FORT LAUDERDALE	FL	33321	792,400
5	F00772267	HILLS PHARMACY	HILLSBOROUGH	TAMPA	FL	33616	662,400
6	B0752116	JR PHARMACY	ORANGE	ORLANDO	FL	32837	618,600
7	AW8830267	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	609,700
8	BW6548760	WALGREEN CO.	SEMNOLE	CASSELBERRY	FL	32730	642,800
9	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	642,300
10	BW6072404	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	617,700
11	B09931657	OSBORNE PHARM INC	BROWARD	FORT LAUDERDALE	FL	33317	482,000
12	BW3133916	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	470,600
13	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816	447,200
14	BK7466062	KABS OF TAMPA	HILLSBOROUGH	TAMPA	FL	33613	486,400
15	B03856274	SUPERIOR PHARMACY LLC	HILLSBOROUGH	TAMPA	FL	33609	379,300
16	B06182189	BELOW DRUG	KNOX	KNOXVILLE	TN	37917	362,900
17	FN1182988	NDBP LLC	BROWARD	POWERS BEACH	FL	33064	369,200
18	AW2068897	WALGREEN CO.	PINELLAS	LARGO	FL	33771	362,700
19	FX1428196	KISKEYA PHARMACY	BROWARD	FORT LAUDERDALE	FL	33312	349,200
20	BH9131436	HYGIEA HOLDINGS, LLC	PINELLAS	LARGO	FL	33771	336,700
21	BW7066647	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428	332,800
22	BP4777612	PROSCRIPT PHARMACY SERVICES, INC	BROWARD	FORT LAUDERDALE	FL	33314	322,800
23	AW6430663	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233	318,200
24	BS9699731	SUPERIOR PHARMACY, LLC	HILLSBOROUGH	TAMPA	FL	33616	318,100
25	BR079730	RUPAL ENTERPRISE INC	SUFFOLK	SELDEN	NY	11784	316,800
26	F1672740	JPPD INC	PALM BEACH	BOCA RATON	FL	33431	314,300
27	AS8414128	SCHAEFER DRUGS WELLINGTON	PALM BEACH	WELLINGTON	FL	33414	313,800
28	FF0129708	FUTURE PHARMACY LLC	MIDDLESEX	OLD BRIDGE	NJ	08857	313,800
29	BL3161178	L KRENK	MAUI	KAHULUI	HI	96732	312,600
30	BH9444817	BETTER HEALTH PHARMACY INC	HILLSBOROUGH	SEFFNER	FL	33584	310,300
31	BS9481147	SUPER SAVER PHARMACY	OSCEOLA	KISSIMEE	FL	34744	300,400
32	BW0682967	WALGREEN CO.	ORANGE	ORLANDO	FL	32812	288,900
33	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	286,100
34	AW200908	WALGREEN CO.	BROWARD	HOLLYWOOD	FL	33024	284,100
35	BW6681270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34952	281,000
36	FP1223880	PROGRESSIVE PHARMACY INC.	PALM BEACH	LAKE WORTH	FL	33467	287,400
37	AH2731026	HOLLYWOOD DISCOUNT PHARMACY	BROWARD	HOLLYWOOD	FL	33021	286,300
38	BW7268792	WALGREEN CO.	ORANGE	OCOE	FL	34761	282,400
39	AW200908	WALGREEN CO.	BREVARD	PALM BAY	FL	32908	277,700
40	BS9839434	SARASOTA PHARMACY SERVICES	SARASOTA	SARASOTA	FL	34233	277,300
41	FE1612601	EDGE PHARMACY	POLK	LAKELAND	FL	33803	272,800

Top 80 Pharmacies Sales of Oxycodone 15mg (NDC 62162-0214-02) 2011							
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip	Total
1	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907	411,100
2	FP0863267	HAPPY HARRY'S INC.	SUSSEX	SEAFORD	DE	19973	148,800
3	BE924317	EXPRESS SCRIPTS	SAINT LOUIS	SAINT LOUIS	MO	63134	131,800
4	BW1847438	WALGREEN CO.	SEMNOLE	OVEDO.	FL	32766	128,300
5	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667	127,800
6	BT0167444	THE MEDICINE SHOPPE	ALLEGHENY	OAKMONT	PA	15139	122,000
7	FW0277283	WALGREEN CO.	CALVERT	PRINCE FREDERICK	MD	20678	121,400
8	BT9037966	THE PILL BOX PHARMACY	DE SUSSEX	MILFORD	DE	19963	110,800
9	BW6874684	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981	108,800
10	BC7126667	CAREMED HEALTH CORPORATION	LEE	BONITA SPRINGS	FL	34136	108,300
11	FI1616157	HAPPY HARRY'S, INC.	SUSSEX	MILFORD	DE	19963	106,300
12	BN9244726	NORWIN PHARMACY	WESTMORELAND	IRWIN	PA	16642	106,200
13	FP1866446	PHARMA-1	FRANKLIN	COLUMBUS	OH	43207	106,000
14	AB9244897	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508	106,000
15	FW178878	VILLAGE PHARMACY	LIVINGSTON	DENHAM SPRINGS	LA	70726	101,200
16	BW1648760	WALGREEN CO.	SEMNOLE	CASSELBERRY	FL	32730	99,000
17	AW102004	WALGREEN CO.	BREVARD	PALM BAY	FL	32906	98,900
18	BE9738026	ESTRELLA PHARMACY	MARICOPA	PHOENIX	AZ	85037	96,400
19	AT3701372	CITY PHARMACY INC OF ELKTON	CECIL	ELKTON	MD	21921	94,500
20	BW6661270	WALGREEN CO.	SAINT LUCIE	PORT SAINT LUCIE	FL	34962	93,200
21	AW8830267	WALGREEN CO.	PASCO	PORT RICHEY	FL	34668	93,200
22	AN1666337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901	86,700
23	FW1144674	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	84,300
24	BW6687416	WALGREEN CO.	SEMNOLE	OVEDO	FL	32766	83,300
25	FU1700612	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29606	83,300
26	FW1444896	WALGREEN CO.	ORANGE	ORLANDO	FL	32807	81,300
27	BS9246499	SAFESCRIP PHARMACY #6	CABELL	HUNTINGTON	WV	25701	81,800
28	BW1816781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308	79,900
29	BF700826	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919	79,200
30	BH9870026	HAPPY HARRY'S INC.	NEW CASTLE	BEAR	DE	19701	79,100
31	BW6137681	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222	78,300
32	FJ1206488	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202	77,500
33	FW080818	HAPPY HARRY'S INC.	KENT	DOVER	DE	19904	77,500
34	FW1223869	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801	76,300
35	AW9020639	WALGREEN CO.	MANATEE	BRADENTON	FL	34207	76,800
36	FP1206488	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932	74,400
37	BH9870026	HAPPY HARRY'S INC.	SUSSEX	LAUREL	DE	19956	74,300
38	FW0688272	WALGREEN CO.	CLARK	WINCHESTER	KY	40391	74,200
39	BW12101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948	73,300
40	BW7768769	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33709	73,800
41	AW6043234	WALGREEN CO.	PINELLAS	SAINT PETERSBURG	FL	33712	69,800
42	FW1422812	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99664	68,600
43	BW13381816	WALGREEN CO.	ORANGE	ORLANDO	FL	32806	68,200
44	AW6423080	MAJOR PHARMACY	NEW CASTLE	NEW CASTLE	DE	19720	66,500
45	BW897806	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001	66,000
46	BH9874341	HAPPY HARRY'S INC.	SUSSEX	GEORGETOWN	DE	19947	64,700
47	AW1788462	WALGREEN CO.	MARTIN	STUART	FL	34987	64,700

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC00228-2879-11) 2011						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	B7000826	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
2	BW8487438	WALGREEN CO.	SEMINOLE	OVIDO	FL	32765
3	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667
4	AW1366877	WALGREEN CO.	LEE	FORT MYERS	FL	33907
5	BW5872494	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34981
6	BW6361270	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952
7	FX1433355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	MOGALUSA	LA	70427
8	BW1249160	WALGREEN CO.	SAINT LUCIE	FORT SAINT LUCIE	FL	34952
9	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
10	AN1556337	NATIONAL FAMILY PHARMACY	SEBASTIAN	FORT SMITH	AR	72901
11	BW1548760	WALGREEN CO.	SEMINOLE	CASSELBERRY	FL	32730
12	AW1307138	WALGREEN CO.	CITRUS	HOMOSASSA	FL	34446
13	BW9688992	WALGREEN CO.	MARION	OCALA	FL	34482
14	BW9528651	WALGREEN CO.	PIHELLAS	SAINT PETERSBURG	FL	33702
15	FD0528207	DUMAS HEADS	NEW YORK	NEW YORK	NY	10003
16	BW1229118	WALGREEN CO.	DUVAL	JACKSONVILLE	FL	32216
17	BF5649508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919
18	FW0487122	WALGREEN CO.	CITRUS	HOMOSASSA	FL	34446
19	AW1768463	WALGREEN CO.	MARTIN	STUART	FL	34997
20	BW8940923	WALGREEN CO.	PIHELLAS	LARGO	FL	33771
21	AW3028304	WALGREEN CO.	BREVARD	PALM BAY	FL	32905
22	BW0829957	WALGREEN CO.	ORANGE	ORLANDO	FL	32812
23	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734
24	BB6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917
25	AW0201032	WALGREEN CO.	PALM BEACH	WEST PALM BEACH	FL	33404
26	BW7056547	WALGREEN CO.	PALM BEACH	BOCA RATON	FL	33428
27	AW3388242	WALGREEN CO.	SAINT LUCIE	FORT PIERCE	FL	34950
28	FW0064799	WALGREEN CO.	PALM BEACH	WELLINGTON	FL	33414
29	PH0825313	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	43069
30	AW2390699	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233
31	BJ3678486	J & H STORES INC	BROWARD	FORT LAUDERDALE	FL	33309
32	FW1444695	WALGREEN CO.	ORANGE	ORLANDO	FL	32807
33	AW6043234	WALGREEN CO.	PIHELLAS	SAINT PETERSBURG	FL	33712
34	BW4808929	WALGREEN CO.	BUSSEX	VERO BEACH	FL	32962
35	BW5507415	WALGREEN CO.	SEMINOLE	OVIDO	FL	32765
36	BW5108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816
37	BH4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614
38	BE9503687	E. HARTMAN LLC DBA DEAL DRUGS	DAVIDSON	NASHVILLE	TN	37211
39	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816
40	AW6041153	WALGREEN CO.	PIHELLAS	SAINT PETERSBURG	FL	33703
41	BW7758729	WALGREEN CO.	PIHELLAS	SAINT PETERSBURG	FL	33709
42	PH0853247	HAPPY HARRY'S INC.	BUSSEX	SEAFORD	DE	19723
43	BW0523488	WALGREEN CO.	PASCO	NEW FORT RICHEY	FL	34653
44	BW4933114	WALGREEN CO.	PIHELLAS	SAINT PETERSBURG	FL	33707
45	BW2101880	WALGREEN CO.	CHARLOTTE	FORT CHARLOTTE	FL	33948
46	BA3438505	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 00228-2878-11) January 1, 2012 to June 30, 2012						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222
2	AB9244497	BERNIE'S PHARMACY	ANCHORAGE	ANCHORAGE	AK	99508
3	FB2049446	BYPASS PHARMACY, INC	RALEIGH	BECKLEY	WV	25801
4	PH1151517	HAPPY HARRY'S INC.	BUSSEX	MILFORD	DE	19963
5	BF7000326	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
6	BT0167444	THE MEDICINE SHOPPE	ALLEGHENY	DAKMONT	PA	15139
7	PH1454999	HOWARD FAMILY PHARMACY, INC.	FLOYD	EASTERN	KY	41622
8	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667
9	BF4478803	FRANCK'S EPS	ALLEGHENY	PITTSBURGH	PA	15202
10	FA2348616	ARIZONA PHARMACY # 2	MARICOPA	PHOENIX	AZ	85027
11	AW5430943	WALGREEN CO.	SARASOTA	SARASOTA	FL	34233
12	BW5093658	WALGREEN EASTERN CO., INC.	PROVIDENCE	WOONSOCKET	RI	02895
13	BC8351343	CRAIN TOWERS PHARMACY	ANNE ARUNDEL	CLEM BURNIE	MD	21061
14	BW4050296	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208
15	FW1144574	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801
16	BW7920413	WALGREEN CO.	BALTIMORE	PARKVILLE	MD	21234
17	FU1700512	UPSTATE PHARMACY CROSS CREEK	GREENVILLE	GREENVILLE	SC	29605
18	PH0853247	HAPPY HARRY'S INC.	BUSSEX	SEAFORD	DE	19973
19	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001
20	FW1223659	WALGREEN CO.	RALEIGH	BECKLEY	WV	25801
21	FF1280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
22	BW7185386	NORTHSIDE PHARMACY LLC	LAFAYETTE	LAFAYETTE	LA	70501
23	FW1422512	WALGREEN CO.	MATANUSKA SUSITNA	WASILLA	AK	99654
24	BH9874341	HAPPY HARRY'S INC.	BUSSEX	GEORGETOWN	DE	19947
25	BW3819781	WALGREEN ARIZONA DRUG CO.	MARICOPA	GLENDALE	AZ	85308
26	BW8910879	WALGREENS MAIL SERVICE, INC.	ORANGE	ORLANDO	FL	32819
27	BT7485166	THE WELLNESS PHARMACY INC	DAVIDSON	ANTIDCH	TN	37013
28	FJ1306648	JK SERVICES OF SARASOTA LLC	MANATEE	BRADENTON	FL	34202
29	BW6578734	WALGREEN CO.	BALTIMORE CITY	BALTIMORE	MD	21224
30	BW2101880	WALGREEN CO.	CHARLOTTE	FORT CHARLOTTE	FL	33948
31	FM1704825	MEDARBOR PHARMACY	MONTOOMERY	DAIA CYNWYD	PA	19004
32	BW7143908	WALGREEN CO.	HILLSBOROUGH	TAMPA	FL	33603
33	BX0625560	XPRESS CARE PHARMACY	MARICOPA	AVONDALE	AZ	85392
34	BL9260415	LAKE PHARMACY	LAKE	CLEARLAKE	CA	95422
35	BW9404358	WALGREEN EASTERN CO., INC.	BUCKS	LEVITTOWN	PA	19054
36	BW3037393	WALGREEN HASTINGS CO.	HANDOVER	RIO RANCHO	NM	87124
37	FB2332790	RT TO PHARMACY, INC	CANDLER	CHERRY HILL	NJ	08034
38	BW6027790	WALGREEN CO.	PUEBLO	PUEBLO	CO	81005
39	BW5119498	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53208

Top 50 Pharmacies Sales of Oxycodone 15mg (NDC 52152-0214-02) January 1, 2012 to June 30, 2012				
Rank	Buyer's DEA Number	Buyer's Name	Buyer's State	Total
1	FQ1872844	QUICK CARE PHARMACY INC	CA	3,600
2	AA8612790	CIGNA HEALTH PLAN OF ARIZONA	AZ	2,400
3	BF3545704	FRUTH PHARMACY #16	OH	2,400
4	FD0982846	DELCO DRUGS & SPECIALTY PHARMACY INC.	NY	1,000
5	BB9732389	BASHAS UNITED DRUG #160	AZ	1,000
6	BF1124609	FRUTH PHARMACY OF HURRICANE	WV	900
7	FM0386082	MORRILTON FOOD & DRUG BIG STAR	AR	600
8	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	TX	500
9	AK5643095	KLINGENSMITH'S DRUG STORE	PA	500
10	BR3876084	REEDSBURG MEDIC ARTS PHAR	WI	300
11	AW4125452	BUFFALO DRUGS INC	MI	200
12	BE8487589	EDMONDSON DRUG CO INC	AL	100
13	FT0710649	TAINO STAR PHARMACY INC	NY	100
September 12, 2012				

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Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 52152-0218-02) January 1, 2012 to June 30, 2012						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Total
1	BO9283184	OLD TOWN PHARMACY INC	RICHMOND	STATEN ISLAND	NY	26,000
2	BM4633269	MW & W GLOBAL ENTERPRISES INC	KINGS	BROOKLYN	NY	17,600
3	BR4896794	BARRINGTON-WILSHIRE PHARMACY	LOS ANGELES	LOS ANGELES	CA	12,000
4	PH2338918	NAV MART PHARMACY II	WAYNE	DETROIT	MI	9,700
5	AR5920079	ROSBORO PHARMACY INC	ESSEX	BELLEVILLE	NJ	8,300
6	BR9114000	SAINT MARY AND JESSIE, LLC	MIDDLESEX	PERTH AMBOY	NJ	7,900
7	AP8437199	PARAMOUNT DRUG	HURLINGTON	RIVERSIDE	NJ	7,200
8	BM9698851	MEDMART PHARMACY	FAYETTE	CONNELLSVILLE	PA	7,200
9	BO4568718	BRIDGE & PRATT FAMILY PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	6,100
10	AM9897800	MOONSVILLE PHARMACY	MARSHALL	MOONSVILLE	WV	5,600
11	PH1638266	SCRIPT LIFE PHARMACY	FRESNO	CLOVIS	CA	5,400
12	BD0100317	DEAL ENTERPRISE	VENTURA	SIMI VALLEY	CA	4,800
13	BM0180086	MEDICINE SHOPPE	FRESNO	FRESNO	CA	4,500
14	BR6659712	RIVERSIDE PHARMACY	ETOWAH	GADSDEN	AL	4,100
15	BR9442966	SUPER RX PHARMACY #151	SAN DIEGO	OCEANSIDE	CA	3,600
16	PF1382542	FAMILY PHARMACY	NYE	PAHRUMP	NV	3,000
17	BF4837071	POLLANSBEE PHARMACY	BROOKE	POLLANSBEE	WV	2,600
18	BO0878629	QUICK CHEK PHARMACY DEPT	OCEAN	BEACHWOOD	NJ	2,600
19	BB9128516	SULLIVAN PHARMACY INC	SULLIVAN	LIBERTY	NY	2,400
20	PH1614519	HARPER WOODS PHARMACY LLC	WAYNE	HARPER WOODS	MI	2,400
21	BF3545704	FRUTH PHARMACY #16	PIKE	WAVERLY	OH	2,400
22	FQ1872844	QUICK CARE PHARMACY INC	SAN BERNARDINO	RANCHO COCAMONGA	CA	2,400
23	PH1638117	P & Q PHARMACY INC	NASSAU	FARMINGDALE	NY	2,000
24	FM2413780	MART PHARMACY & SURGICAL	BURLINGTON	BORDENTOWN	NJ	2,000
25	AG2494287	QUICK CHEK PHCY DEPT	HUDSON	RAYONNE	NJ	2,000
26	BM1457642	MISSION PHARMACY	LOS ANGELES	LONG BEACH	CA	2,000
27	AM2905935	M B DRUGS INC	KINGS	BROOKLYN	NY	1,800
28	BF7447774	PHARMACIA SAN ANTONIO	CAMDEN	CAMDEN	NJ	1,800
29	FC0727204	CHURCH SQUARE PHARMACY	CUYAHOGA	CLEVELAND	OH	1,700
30	BB9732389	BASHAS UNITED DRUG #160	PIMA	TUCSON	AZ	1,600
31	PA2650807	AGHAPY PHARMACY INC	RIVERSIDE	SAN JACINTO	CA	1,600
32	FT0748333	TOTAL PHARMACY AND COMPOUNDING SERVICES	HARRIS	HOUSTON	TX	1,500

Top 50 Pharmacies Sales of Oxycodone 30mg (NDC 00228-2879-11)						
January 1, 2012 to June 30, 2012						
Rank	Buyer's DEA Number	Buyer's Name	Buyer's County	Buyer's City	Buyer's State	Buyer's Zip
1	B77000536	FOOD CITY PHARMACY #674	KNOX	KNOXVILLE	TN	37919
2	BA3438508	NEW ALBERTSON'S, INC.	CLARK	LAS VEGAS	NV	89128
3	F71280089	FOOD CITY PHARMACY # 616	KNOX	KNOXVILLE	TN	37932
4	FD0598207	DUANE READE	NEW YORK	NEW YORK	NY	10003
5	B72649508	FOOD CITY PHARMACY #694	KNOX	KNOXVILLE	TN	37919
6	AW9808568	WINDSOR PHARMACY	MIDDLESEX	EAST BRUNSWICK	NJ	08816
7	BW2101880	WALGREEN CO.	CHARLOTTE	PORT CHARLOTTE	FL	33948
8	BW4963977	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89030
9	BW3108178	WALGREEN EASTERN CO., INC.	MIDDLESEX	EAST BRUNSWICK	NJ	08816
10	BW6630380	WAL-MART PHARMACY 10-2627	HILLSBOROUGH	TAMPA	FL	33612
11	FR1435355	ROCKY'S MED SHOPPE, LLC	WASHINGTON	BOCALUSA	LA	70427
12	AK3221140	KEANSBURG DRUGS	MONMOUTH	KEANSBURG	NJ	07734
13	BW6917972	WALGREEN CO.	CLARK	NORTH LAS VEGAS	NV	89032
14	BW9875040	HAPPY HARRY'S INC.	NEW CASTLE	WILMINGTON	DE	19806
15	BW6383169	BELEW DRUG	KNOX	KNOXVILLE	TN	37917
16	BW4713992	WALGREEN CO.	PASCO	HUDSON	FL	34667
17	PH1306984	HOPKINS PHARMACY	PHILADELPHIA	PHILADELPHIA	PA	19128
18	AW3732119	WALGREEN ARIZONA DRUG CO.	PIMA	TUCSON	AZ	85712
19	BW8421707	WALGREEN CO.	CLARK	LAS VEGAS	NV	89107
20	FR0825313	HUMANA PHARMACY INC DBA RIGHTSOURCE	BUTLER	WEST CHESTER	OH	45069
21	BH4285309	HEALTHWISE PHARMACY	HILLSBOROUGH	TAMPA	FL	33614
22	BW4985622	WALGREEN CO.	CLARK	LAS VEGAS	NV	89108
23	BW4319338	WALGREEN CO.	BLOUNT	ALCOA	TN	37701
24	BW3737791	WALGREEN CO.	CLARK	LAS VEGAS	NV	89121
25	BW0882987	WALGREEN CO.	ORANGE	ORLANDO	FL	32812
26	B87719795	SHAYOKA PHARMACY	MIDDLESEX	PERTH AMBOY	NJ	08861
27	BW6842656	WALGREEN EASTERN CO., INC.	BUFFOLK	BELDEN	NY	11784
28	BD1649978	DISNEY PHARMACY SERVICES	KNOX	POWELL	TN	37849
29	FW1672422	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10305
30	BW6997906	WALGREEN CO.	PUEBLO	PUEBLO	CO	81001
31	BW8856568	WALGREEN EASTERN CO., INC.	RICHMOND	STATEN ISLAND	NY	10312
32	AW5430943	WALGREEN CO.	BARABOTA	BARABOTA	FL	34233
33	BW5837591	WALGREEN CO.	MILWAUKEE	MILWAUKEE	WI	53222
34	BT6419083	THE HOMETOWN PHARMACY	LAWRENCE	NEW CASTLE	PA	16101
35	BW7249623	WALGREEN CO.	CLARK	LAS VEGAS	NV	89106
36	BP9744524	PRESCRIPTION SOLUTIONS BY OPTUMRX	SAN DIEGO	CARLEBAD	CA	92010

The following charts and graphs have been compiled from ARCOS reports your firm has previously submitted to DEA. The data was reviewed and the purchases of a few of your customers will be addressed during our discussion.

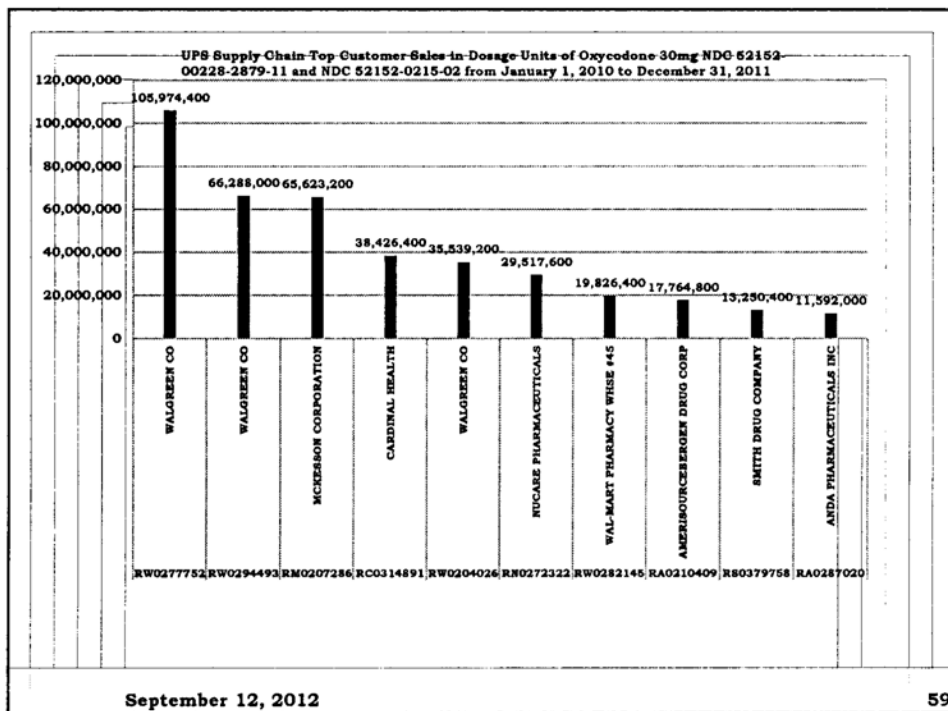
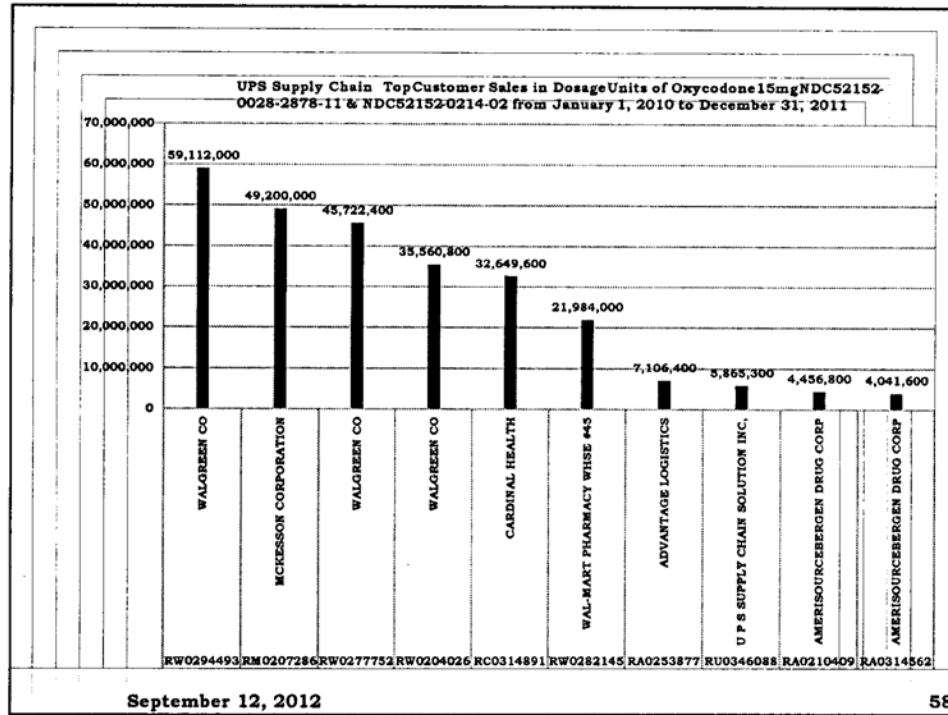
The mentioning of specific customers is NOT to be implied that the sale of controlled substances to these customers is illicit or that they may be involved in illicit activities.

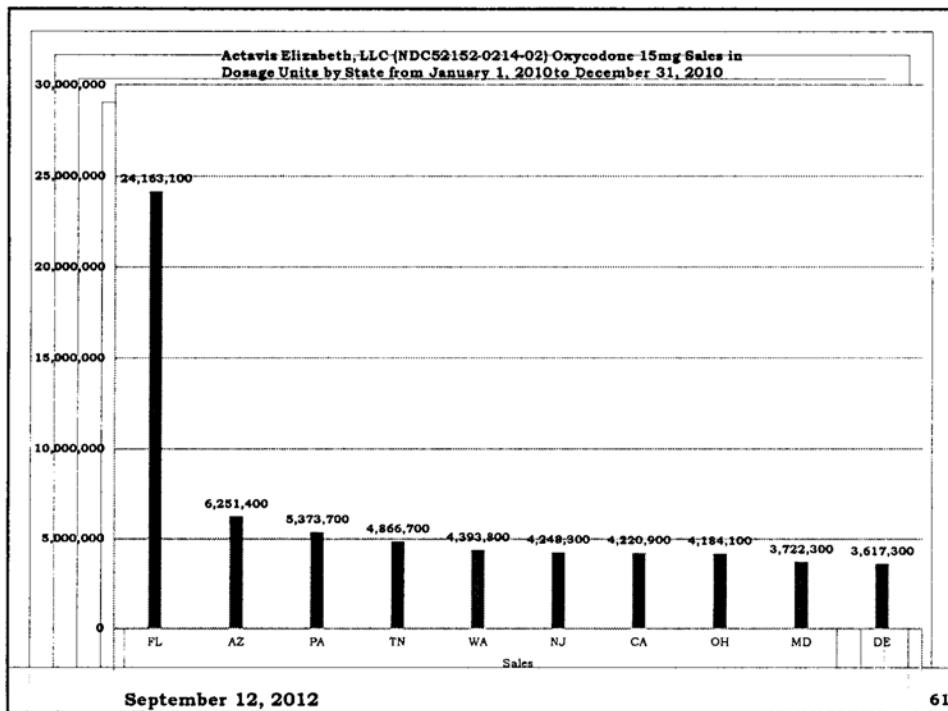
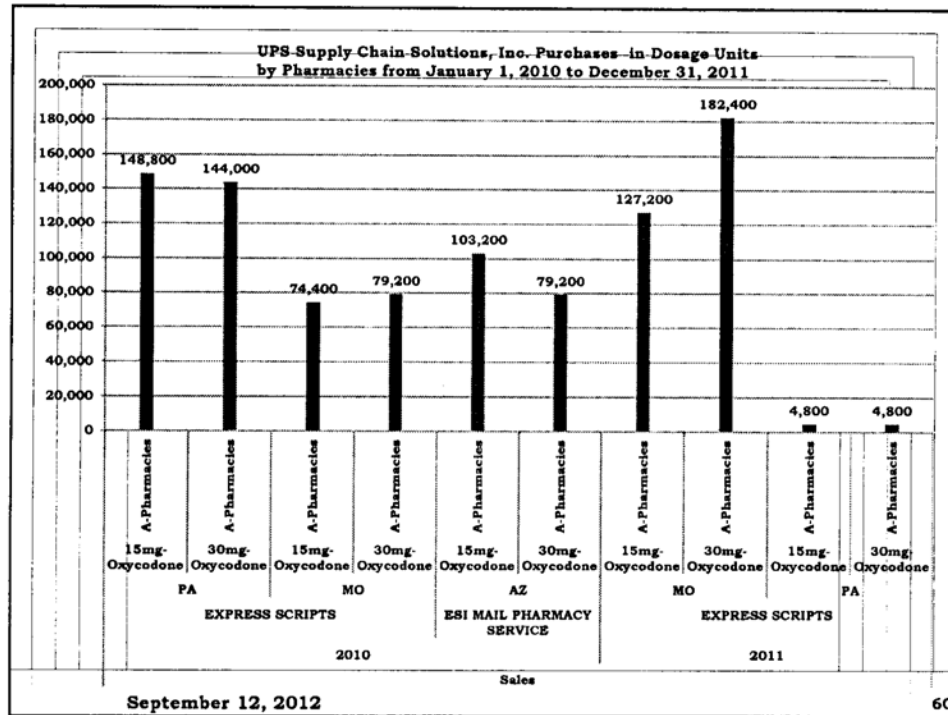
It also should NOT be inferred that based upon the documentation provided to you that your company should terminate or restrict business with any customer discussed for the purposes of this presentation.

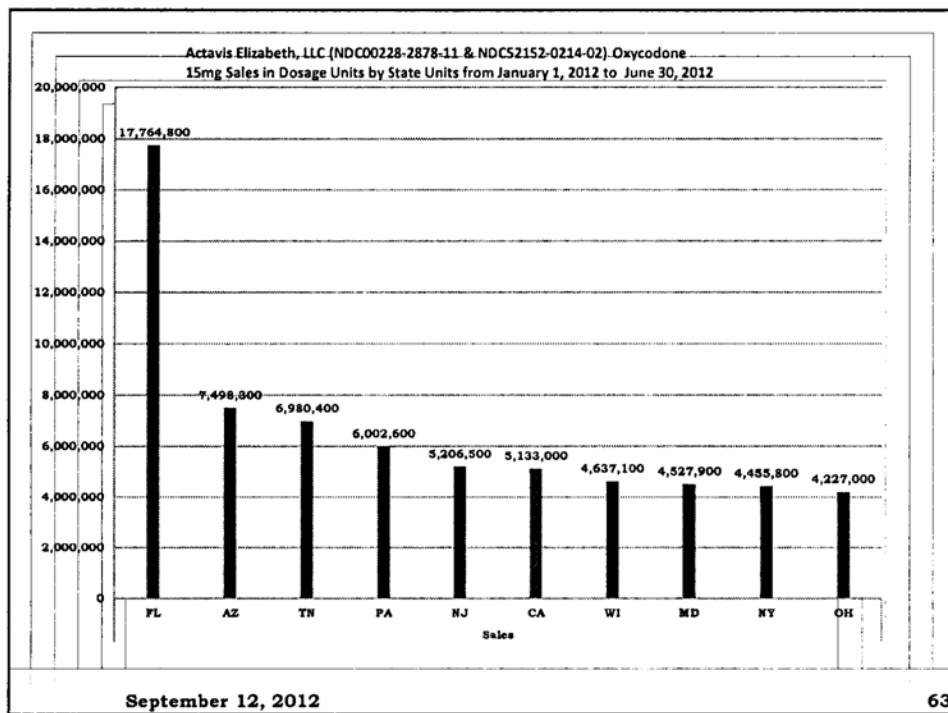
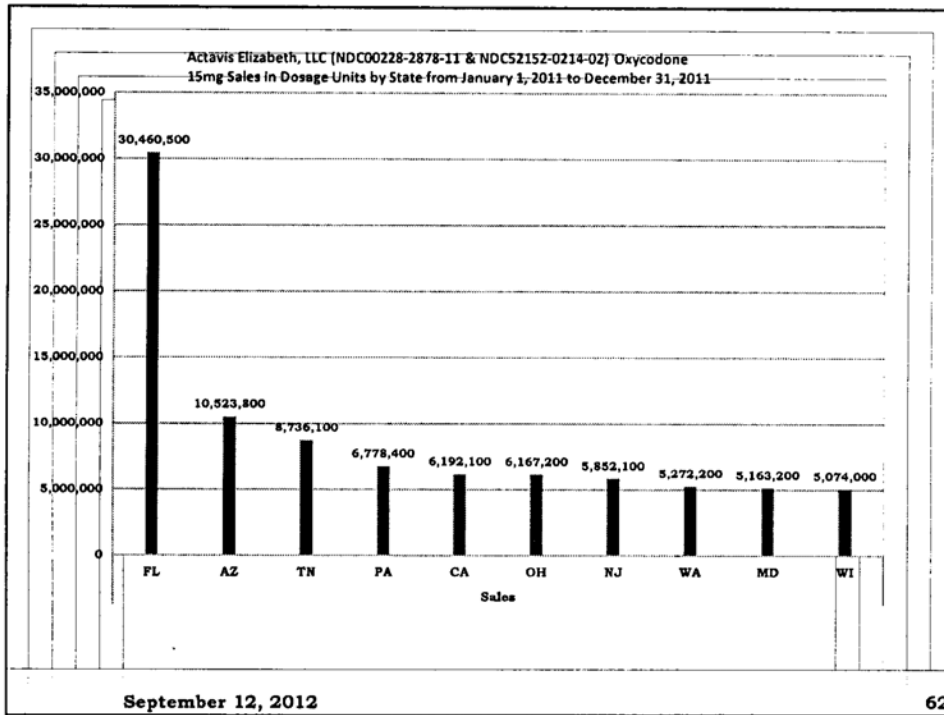
It is incumbent upon you to know your customers, fully review all orders for controlled substances and to exercise due diligence procedures prior to deciding whether or not to terminate or restrict sales to any customer.

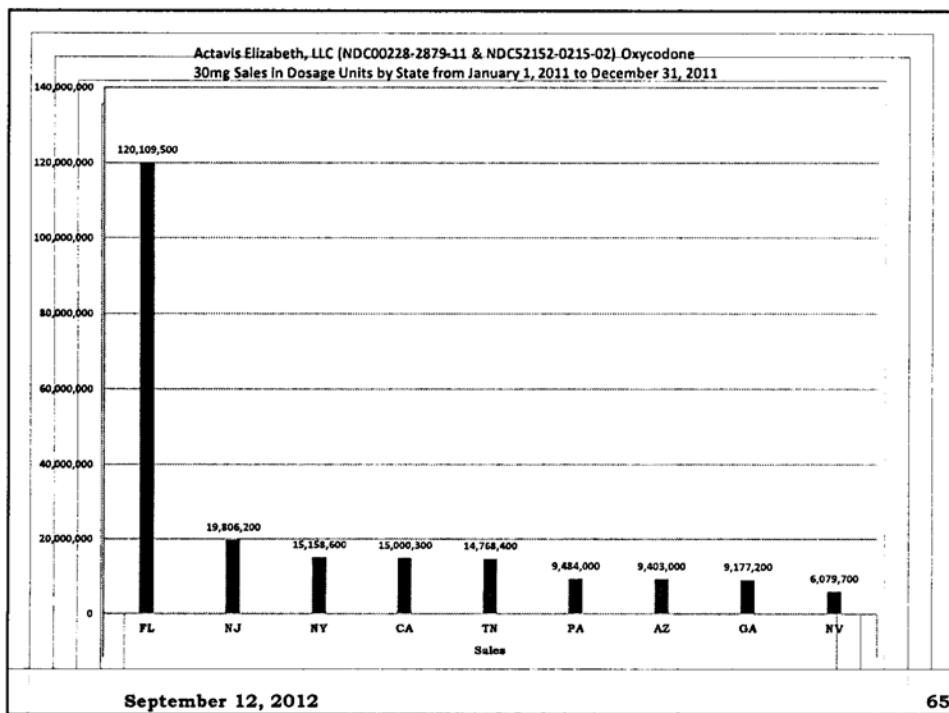
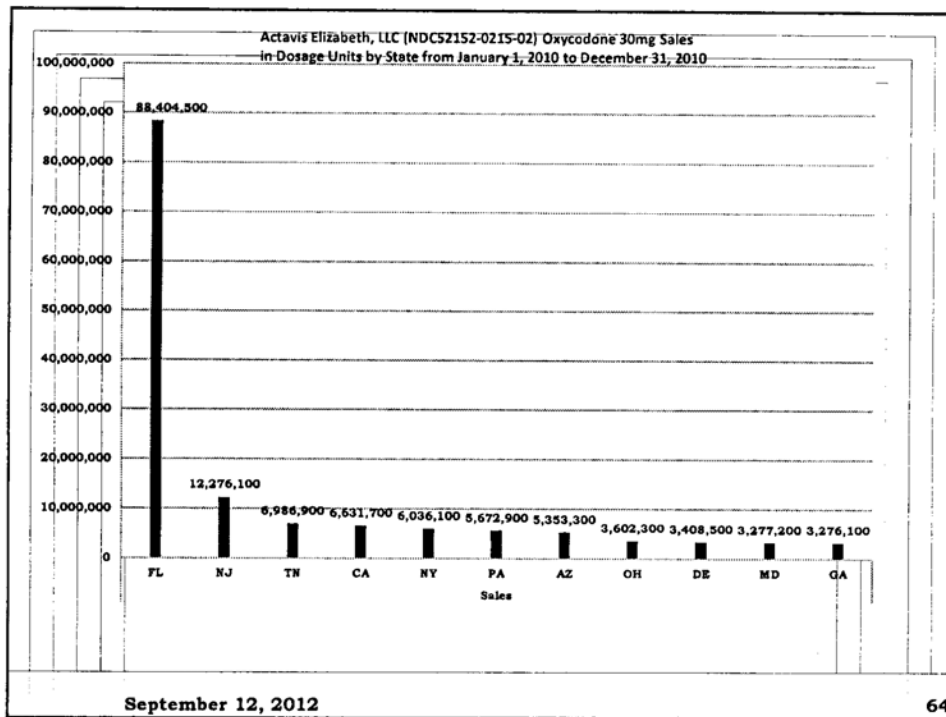
September 12, 2012

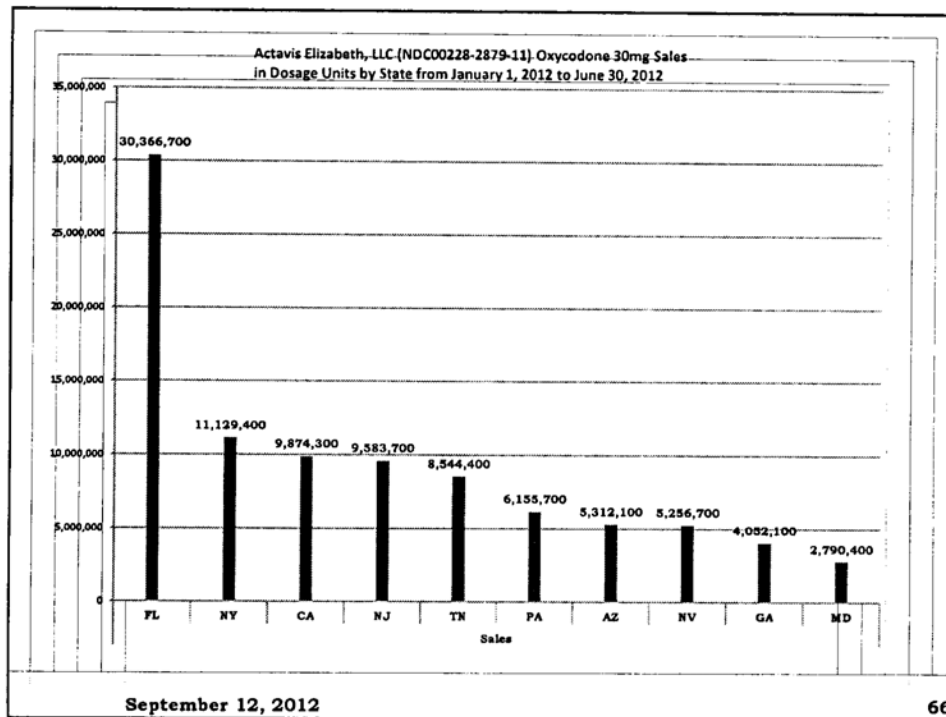
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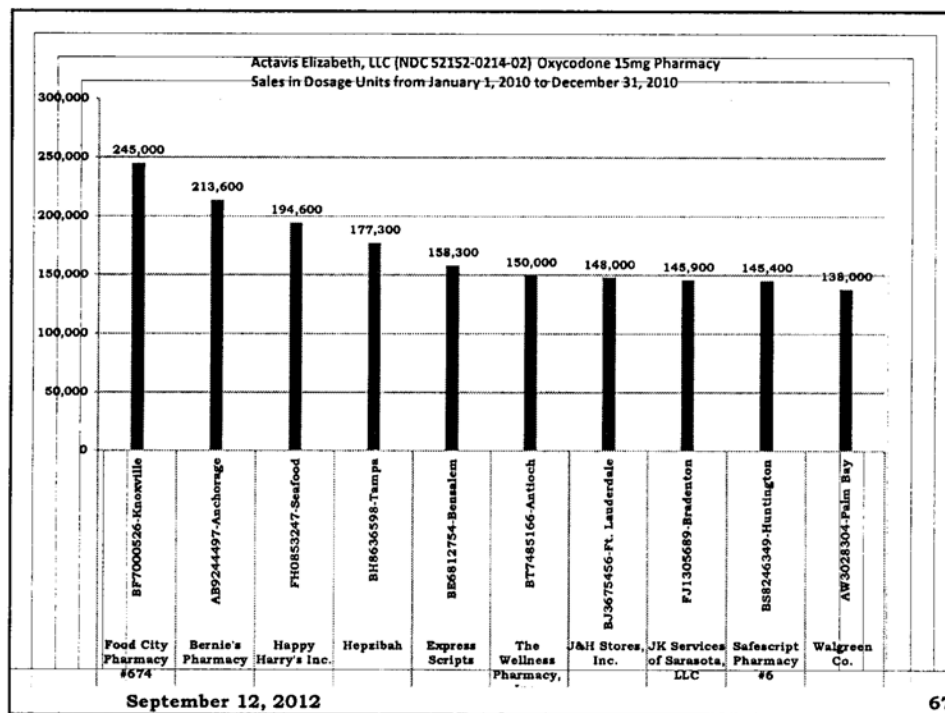




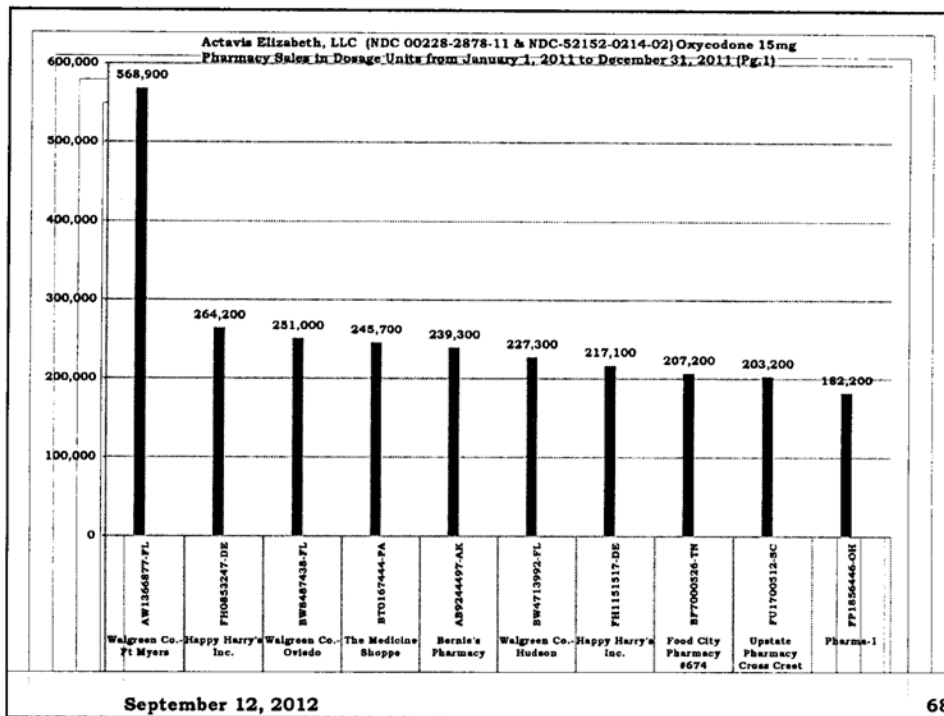




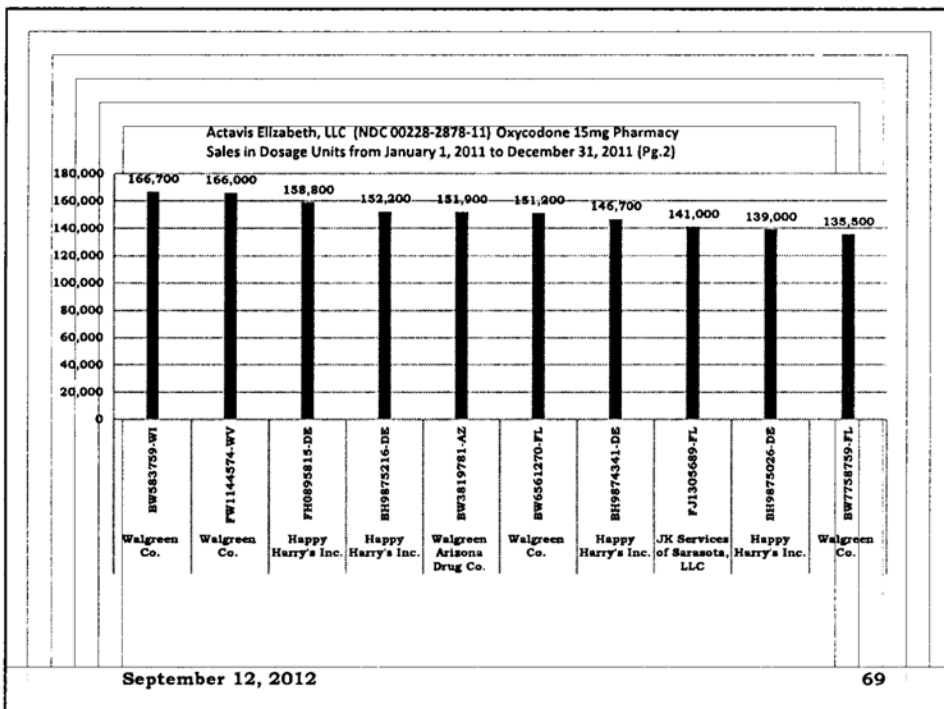
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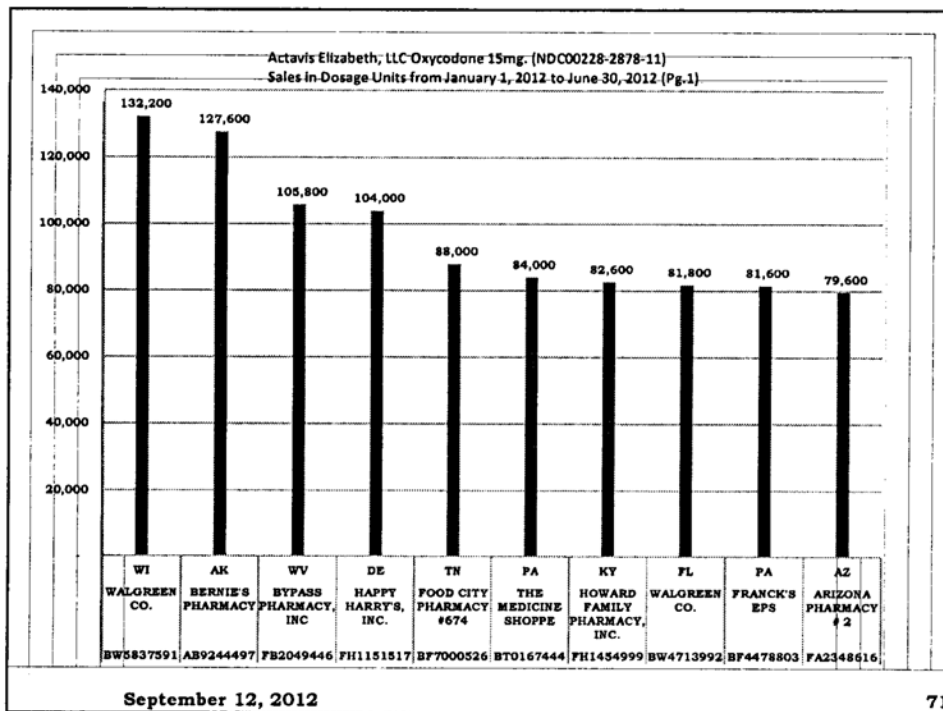
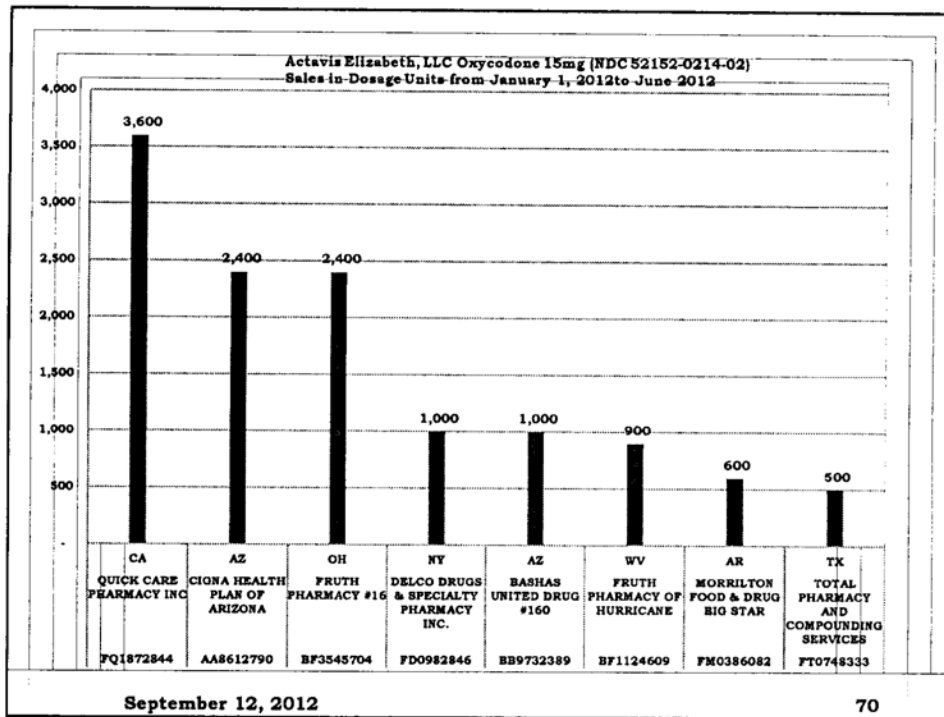
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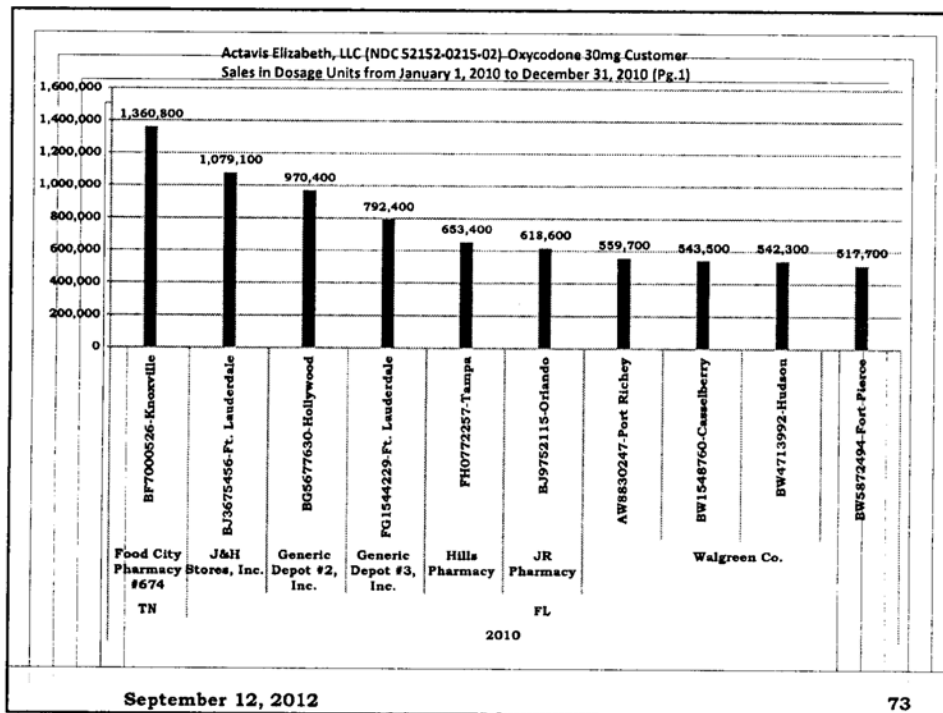
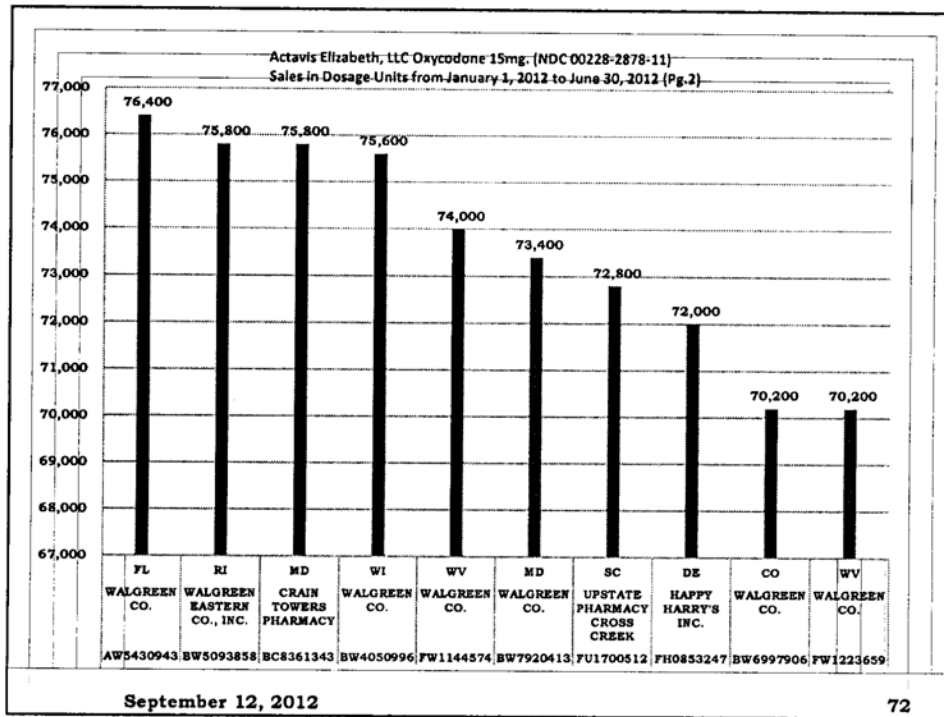


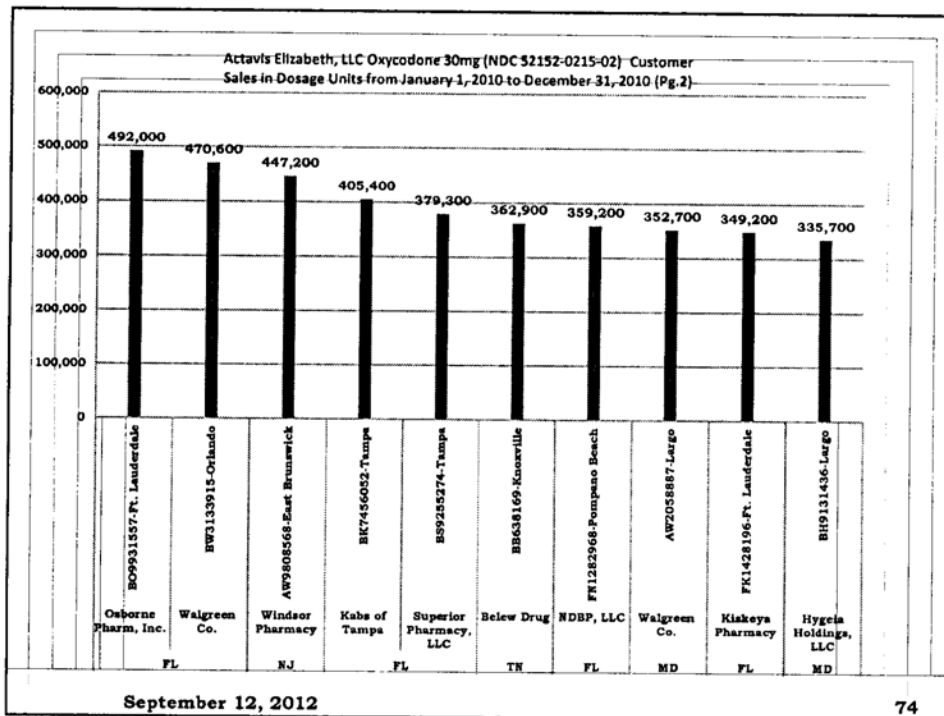
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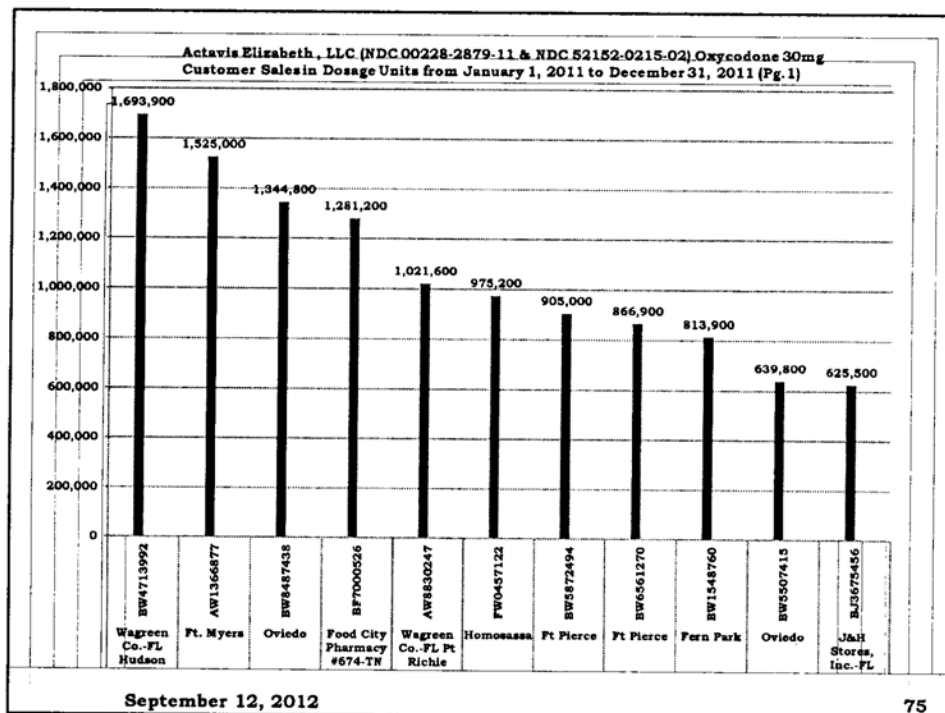
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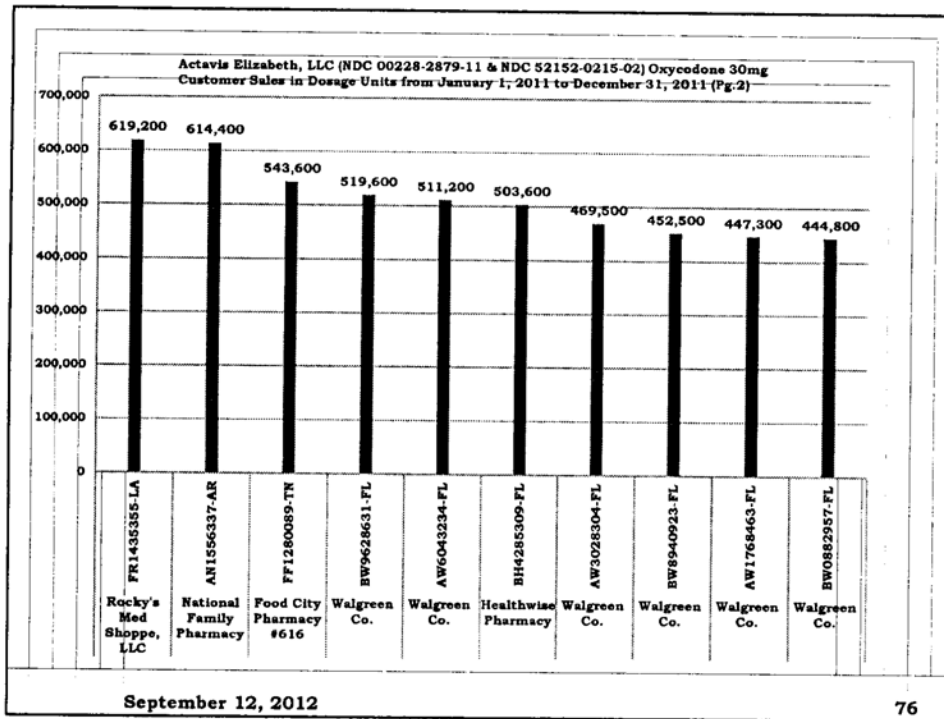




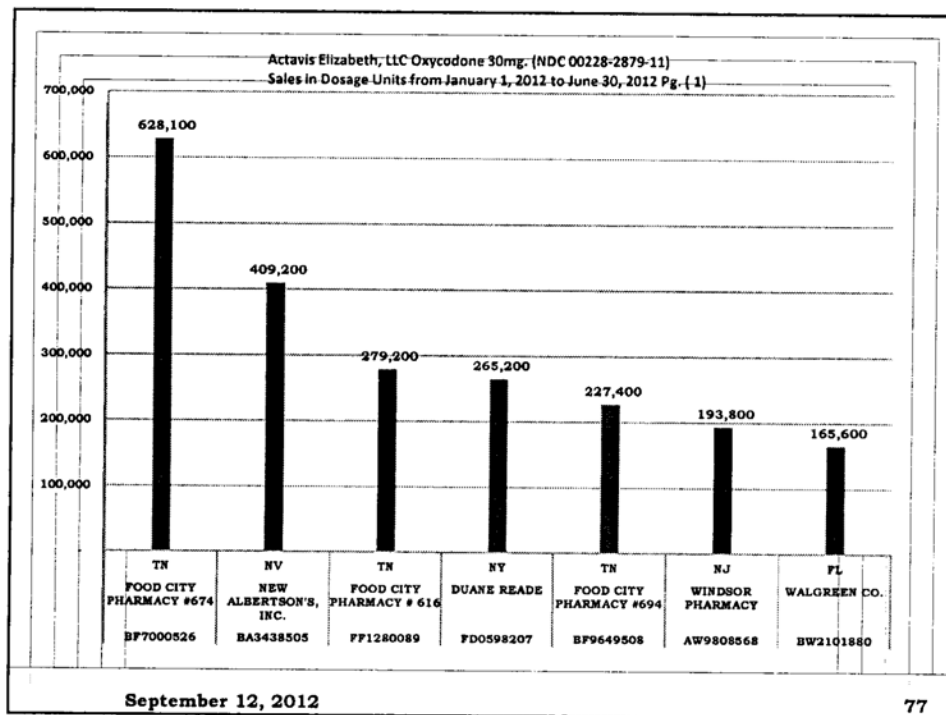
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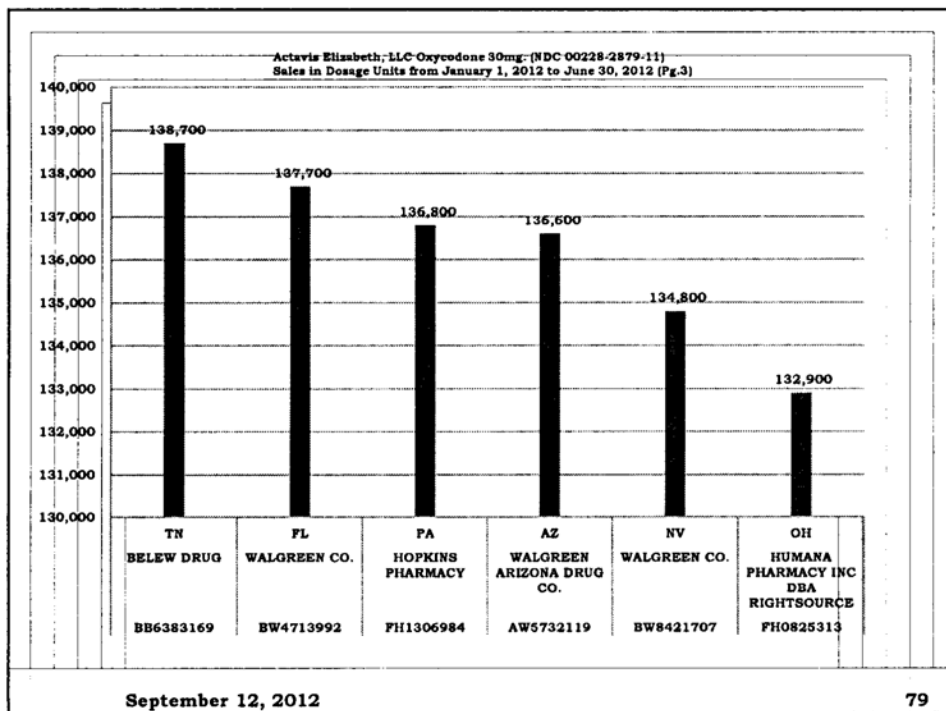
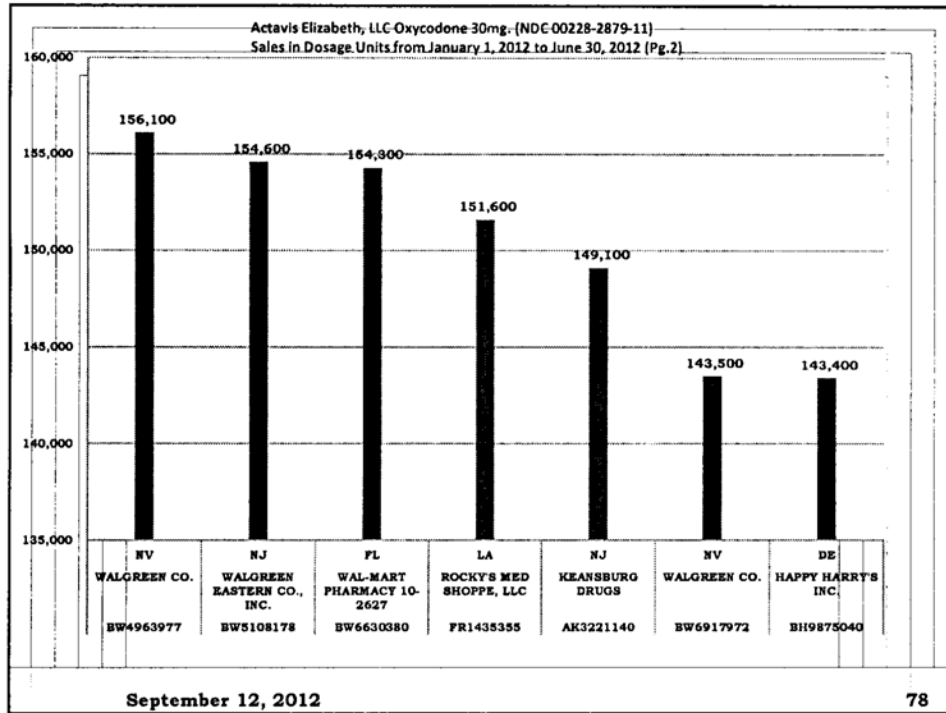
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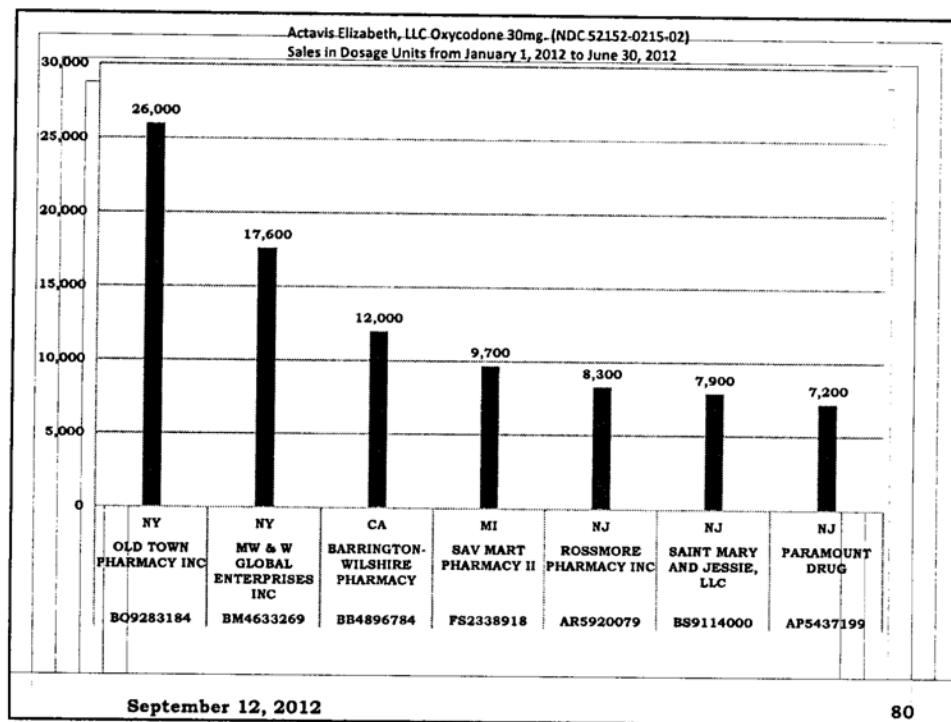


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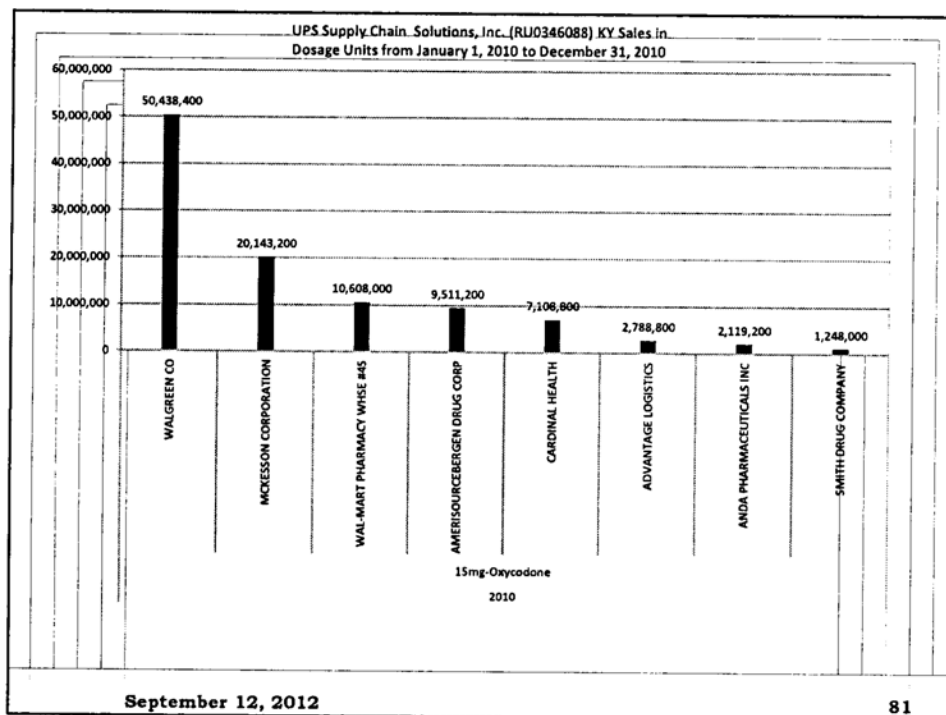


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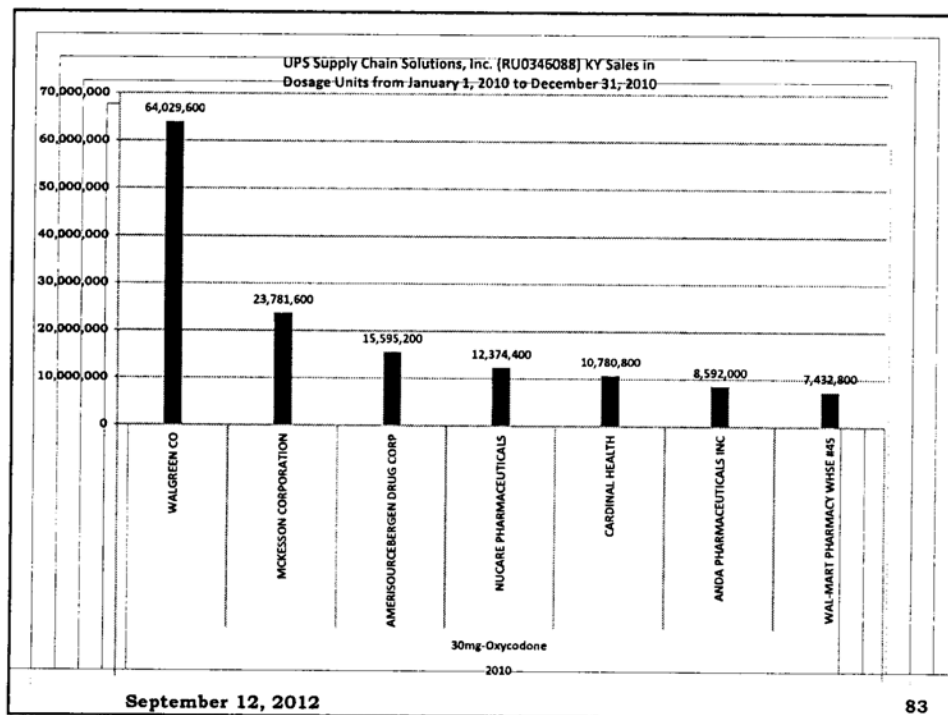
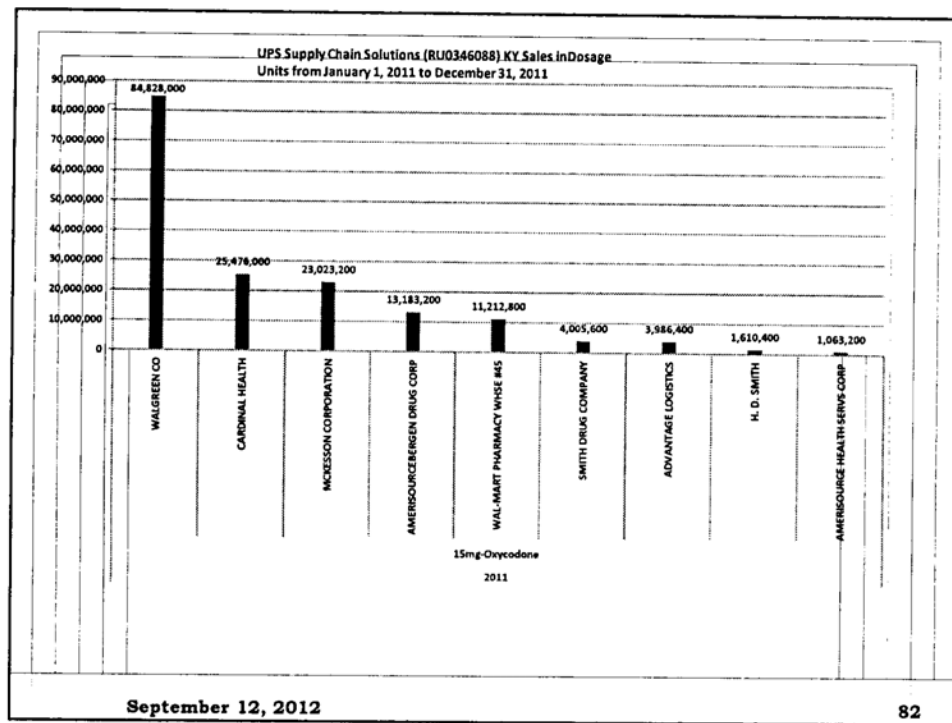


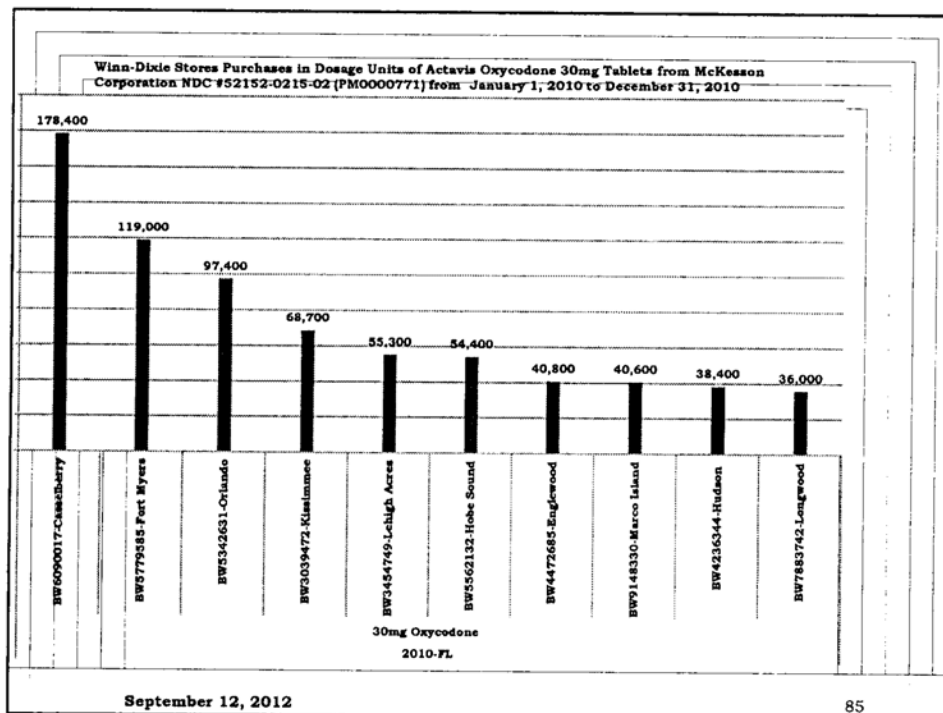
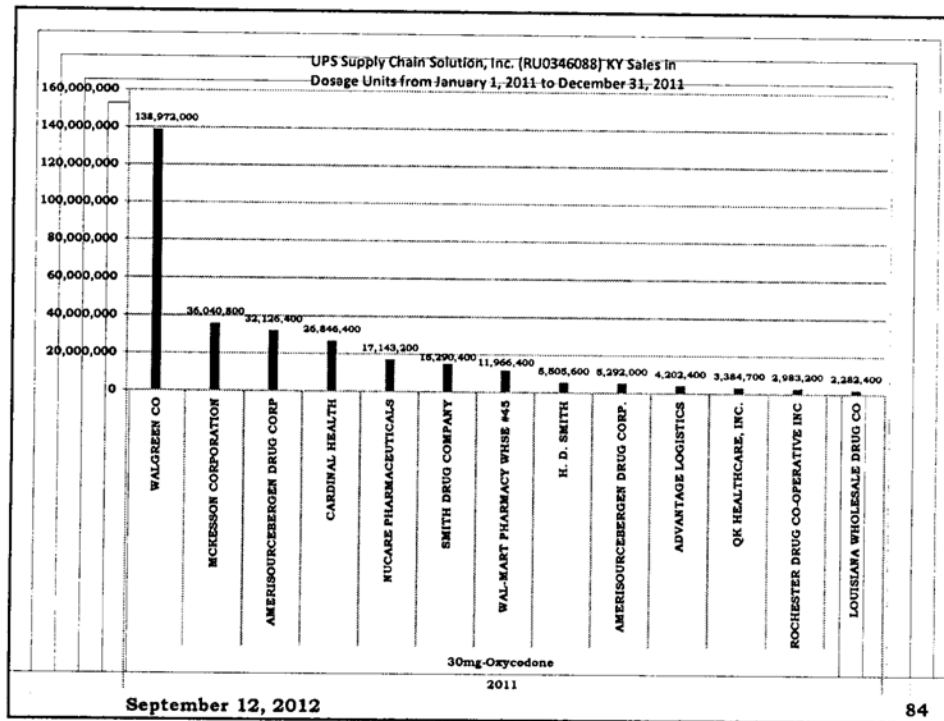


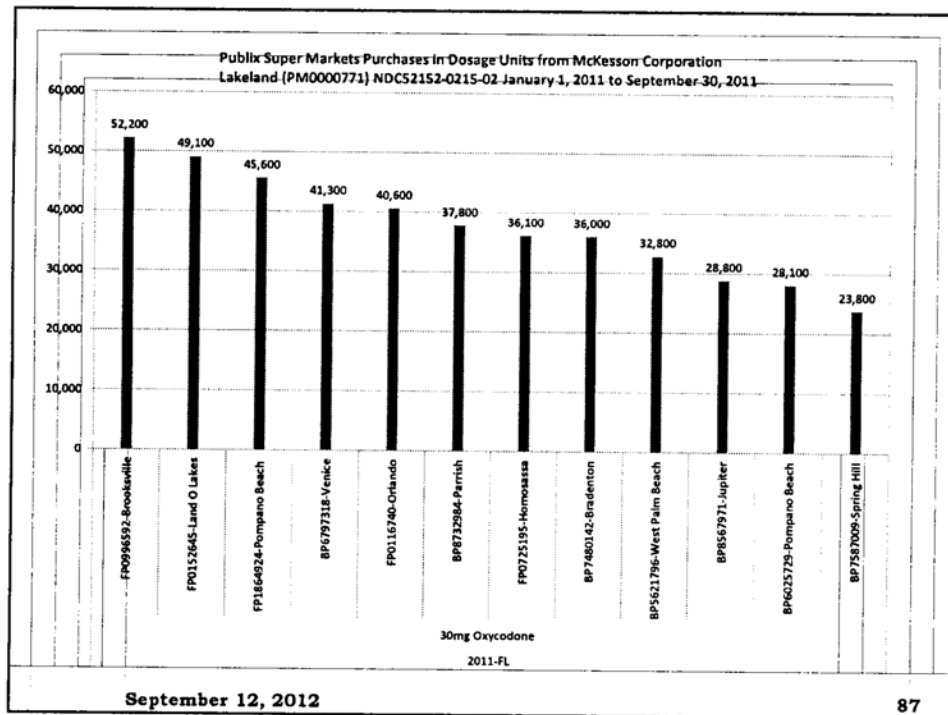
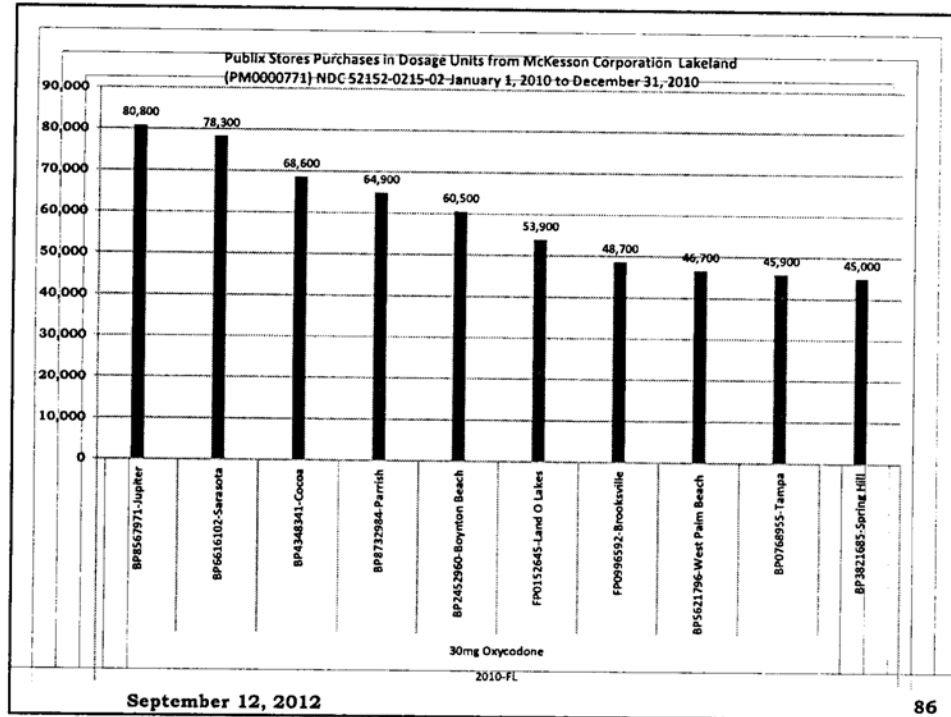
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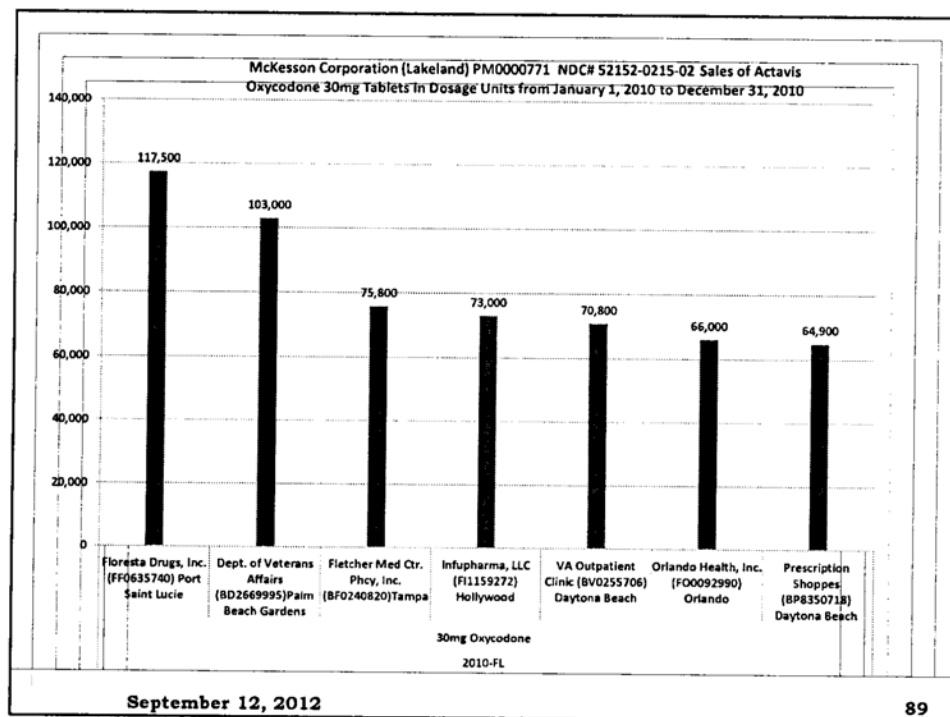
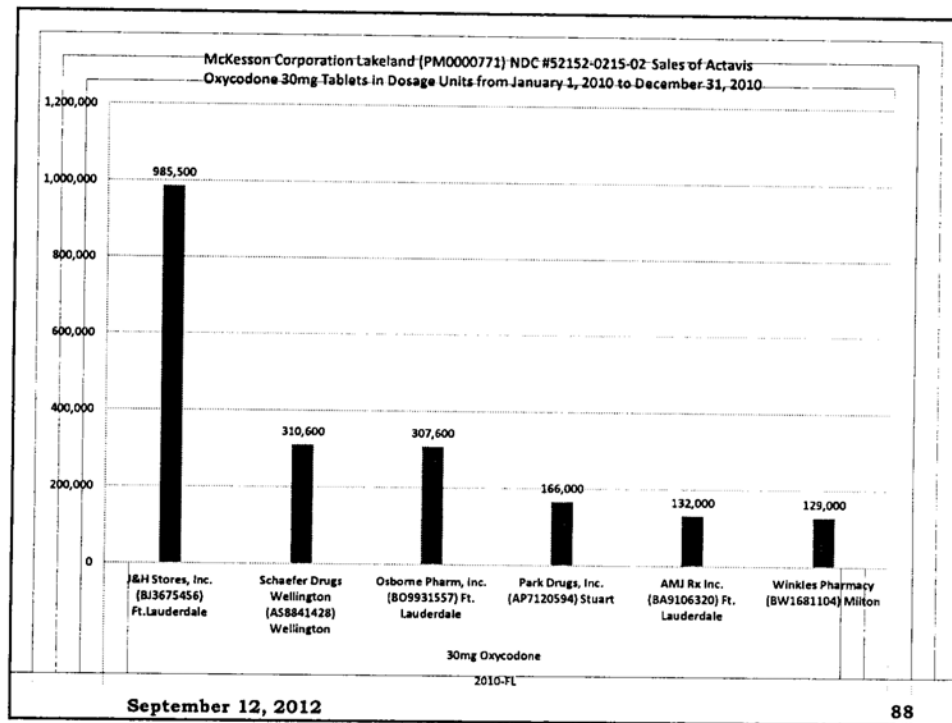


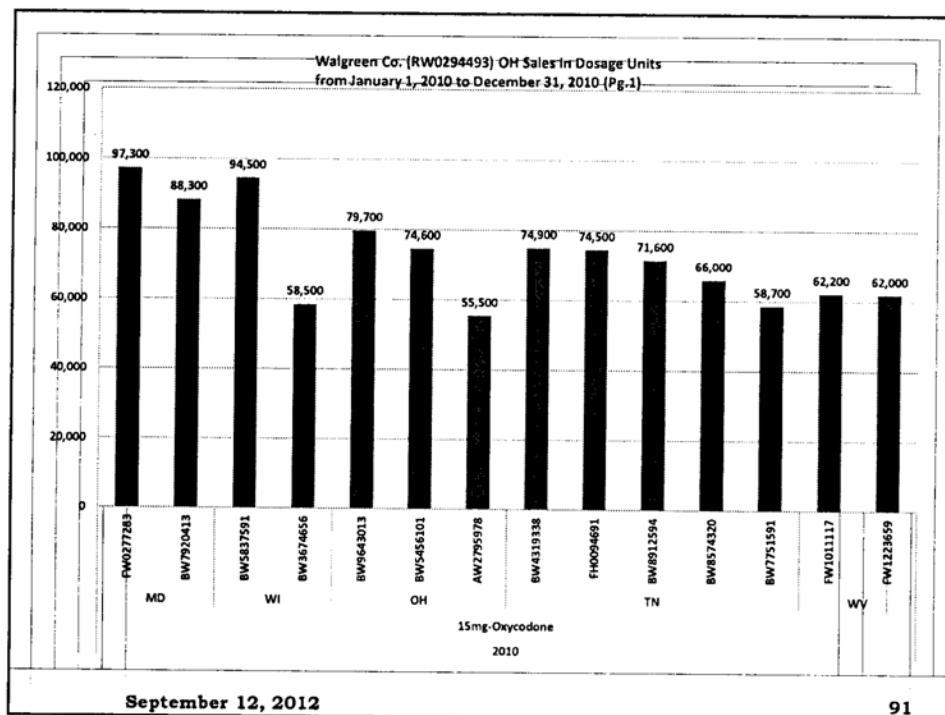
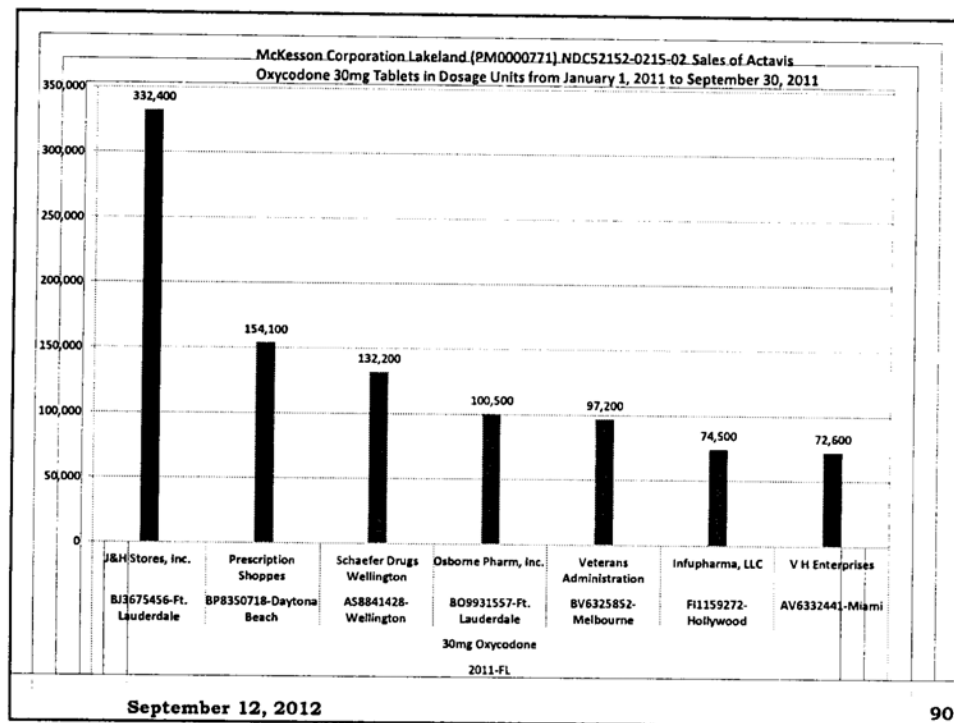
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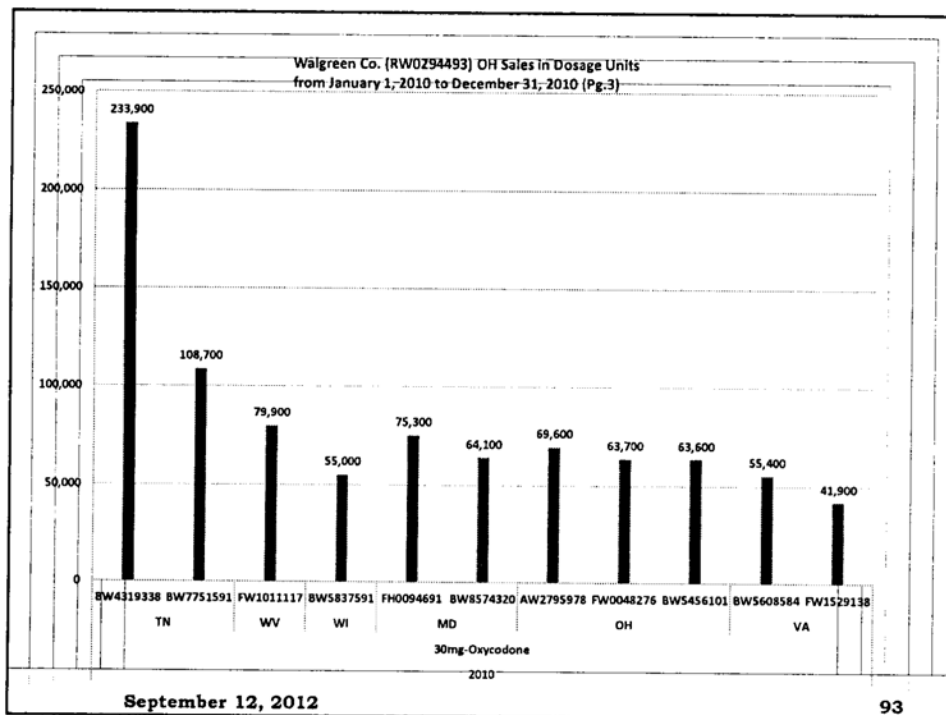
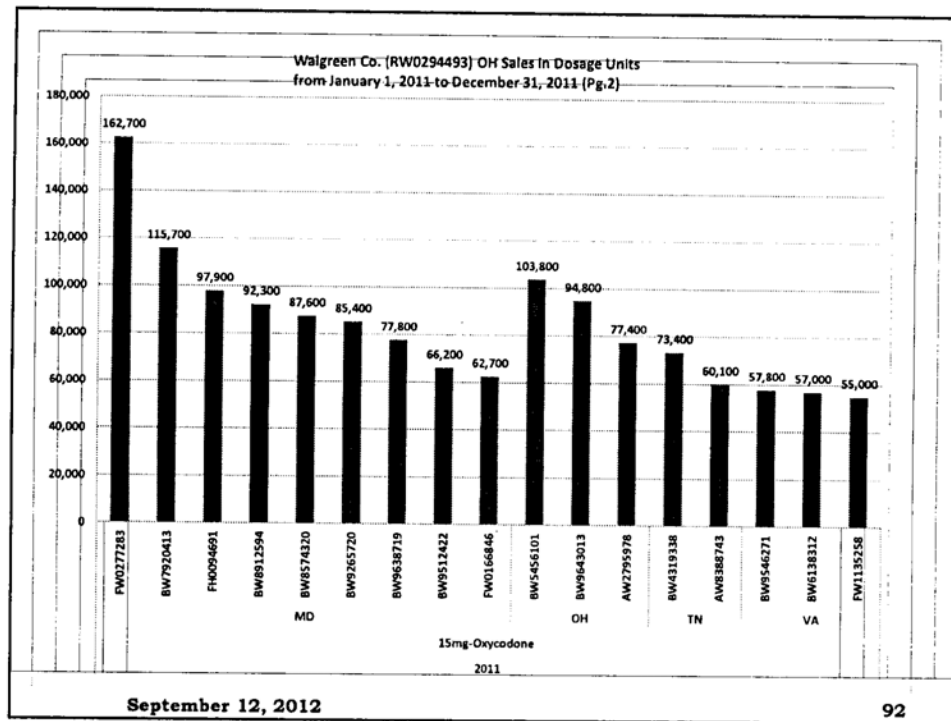


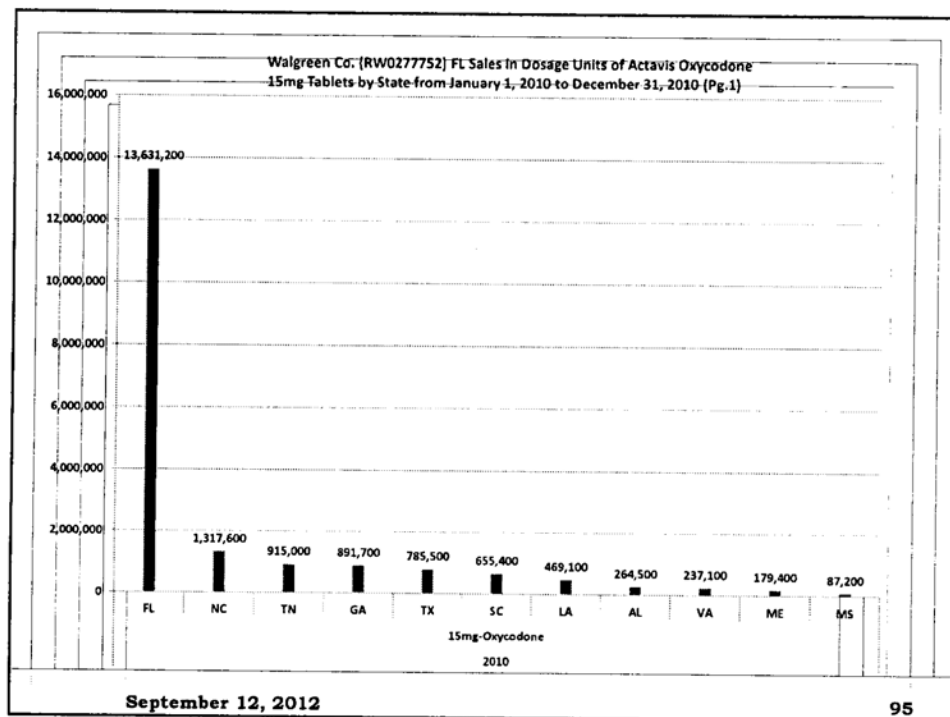
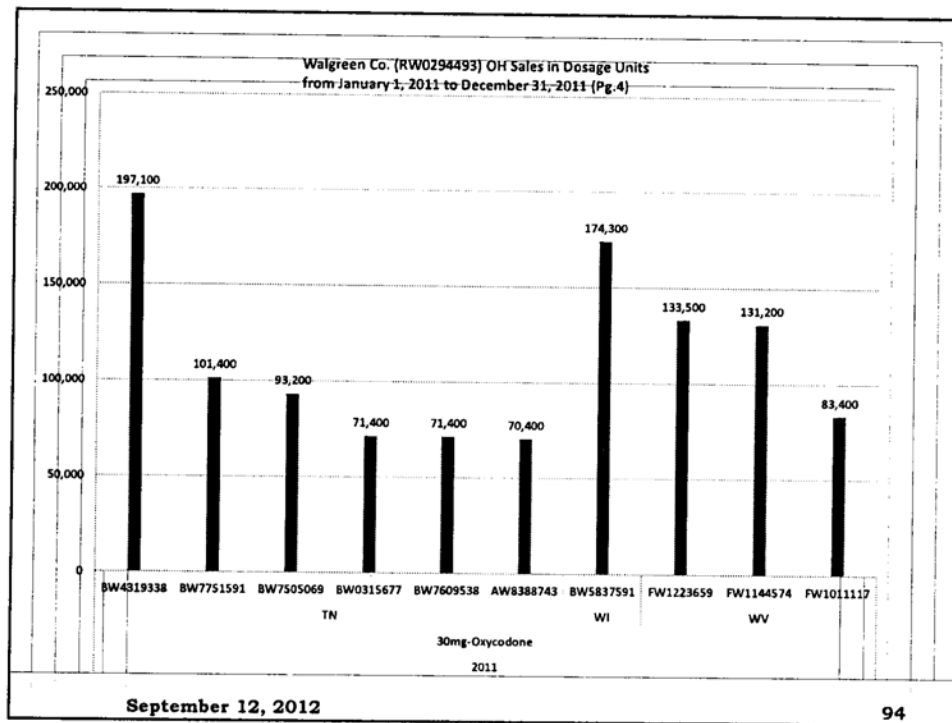


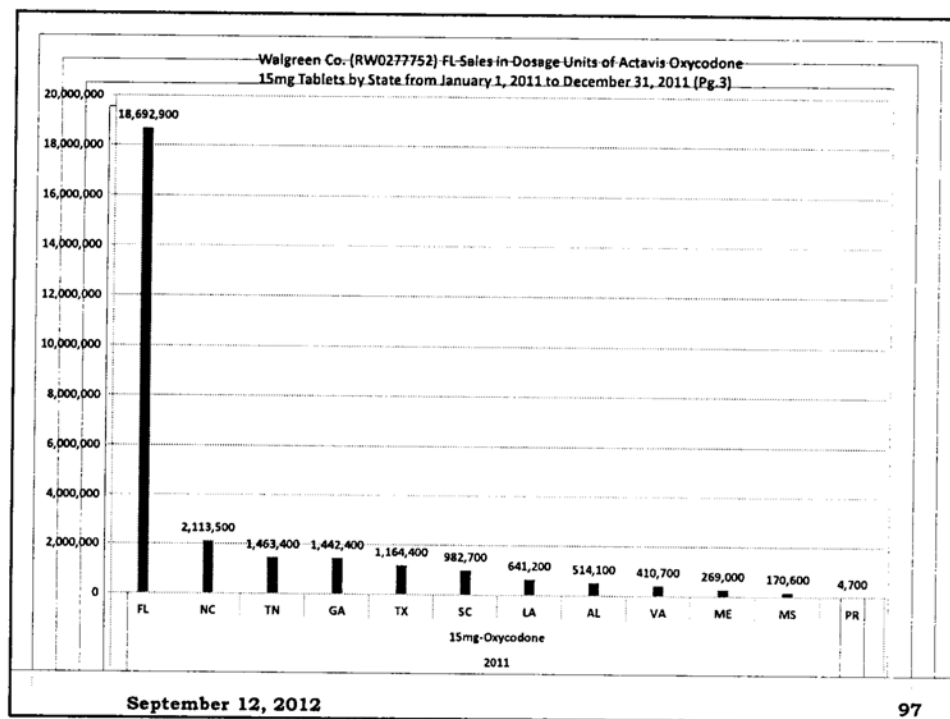
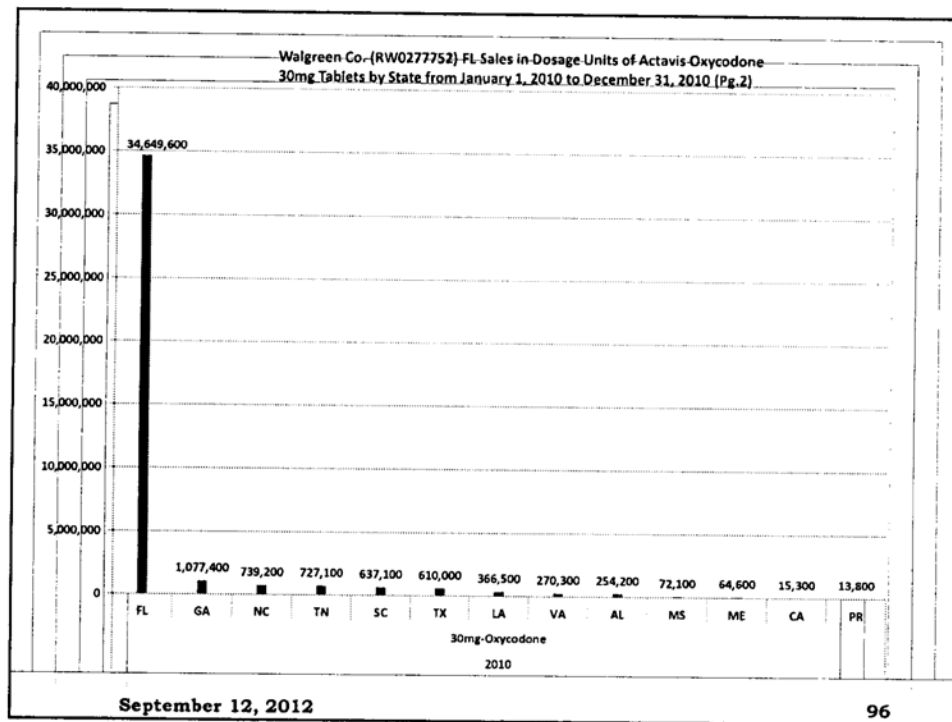


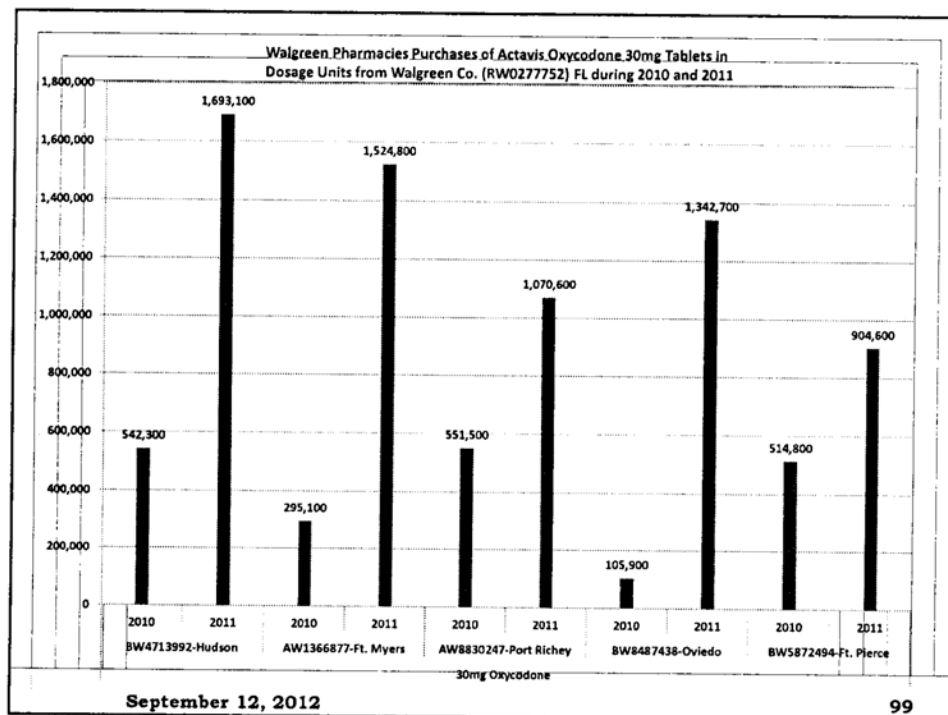
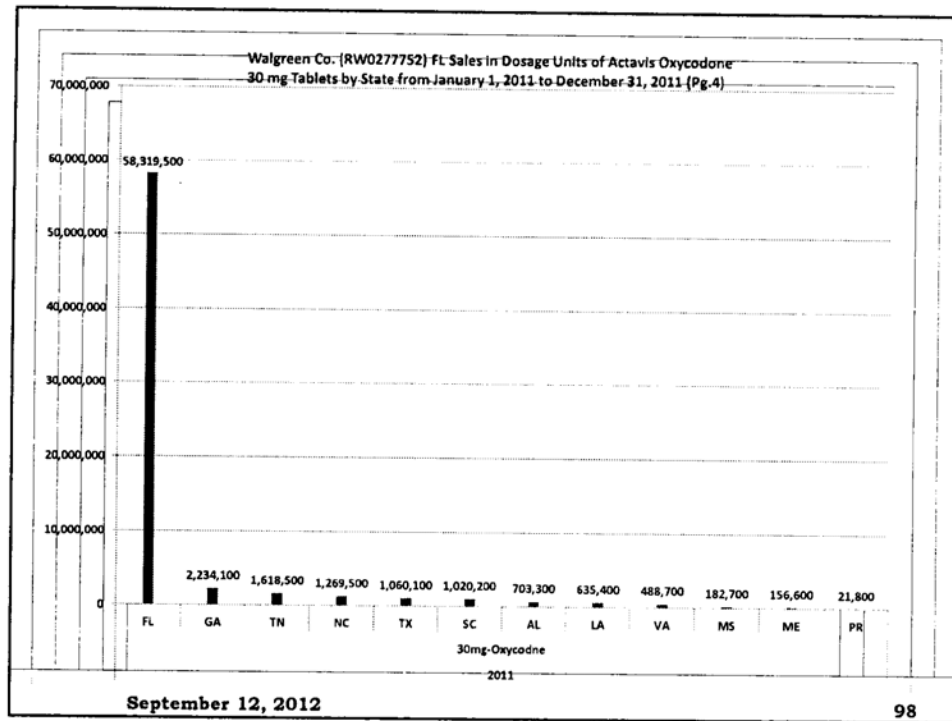


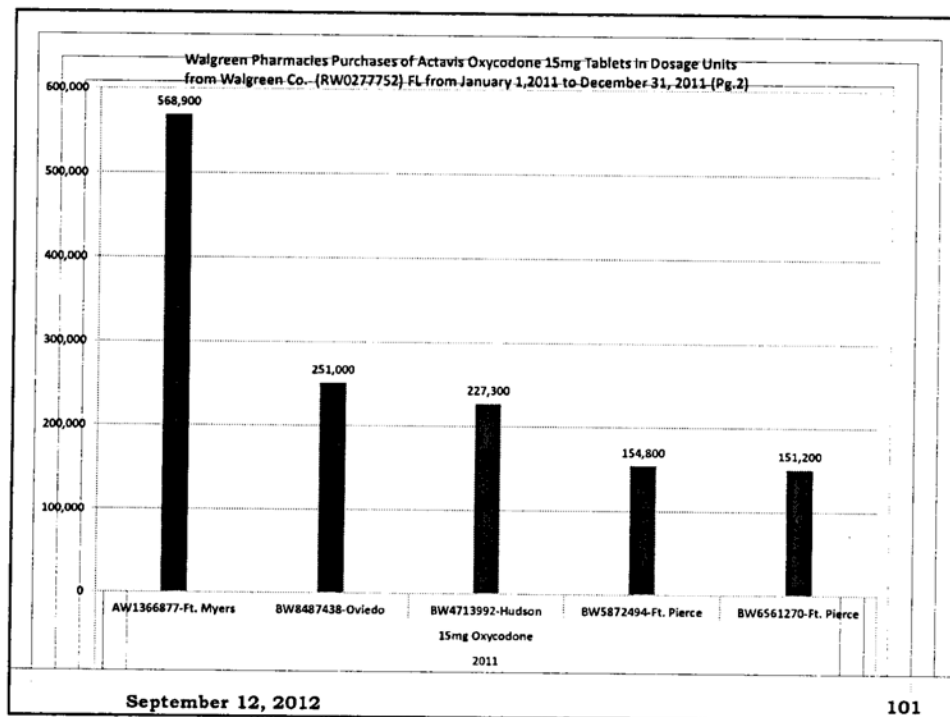
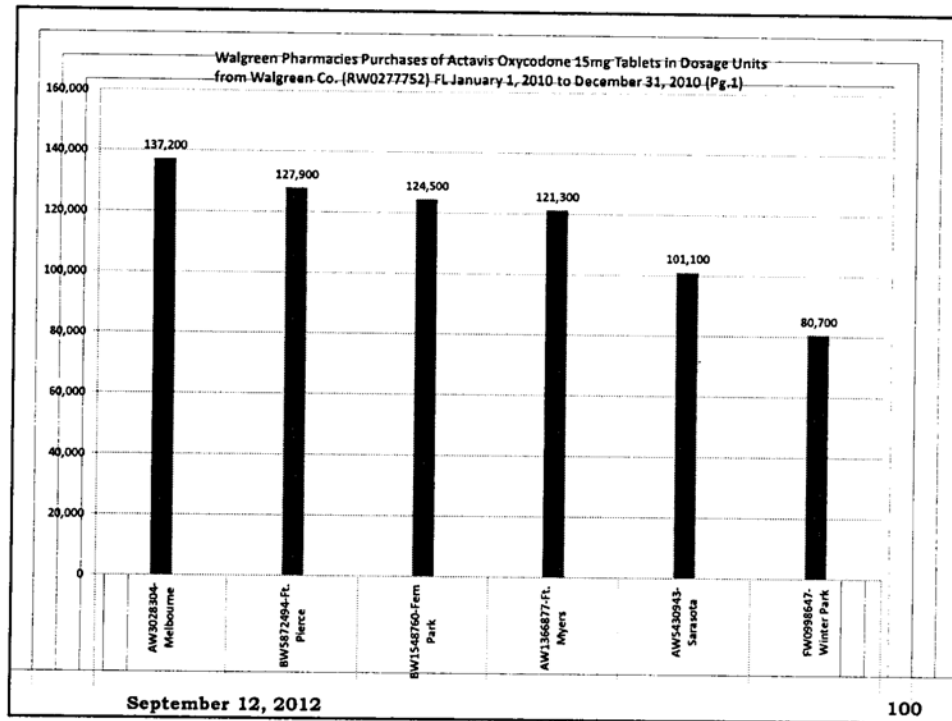


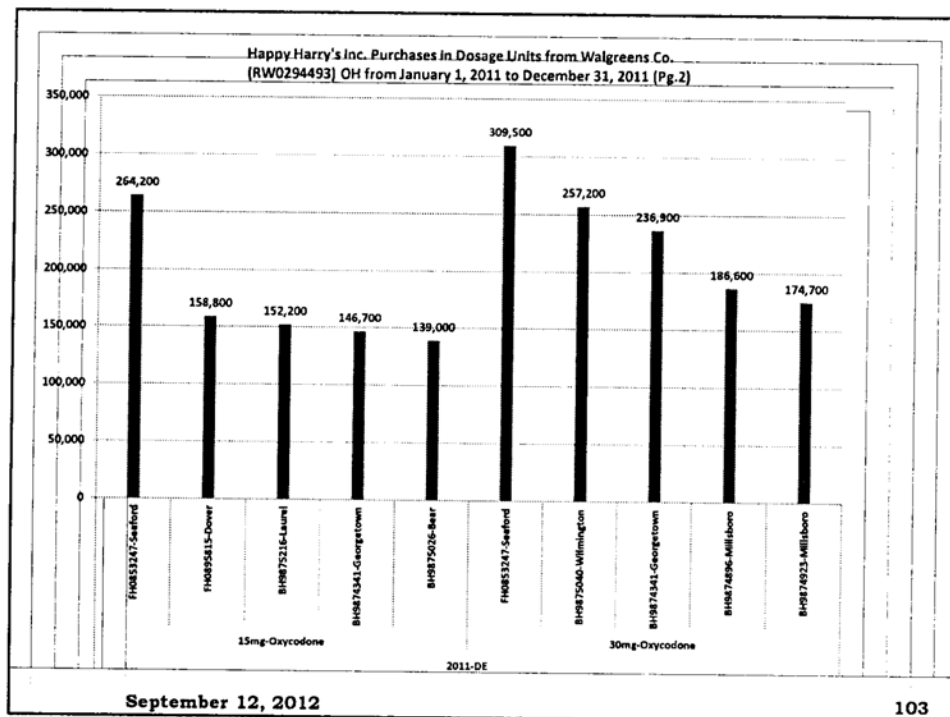
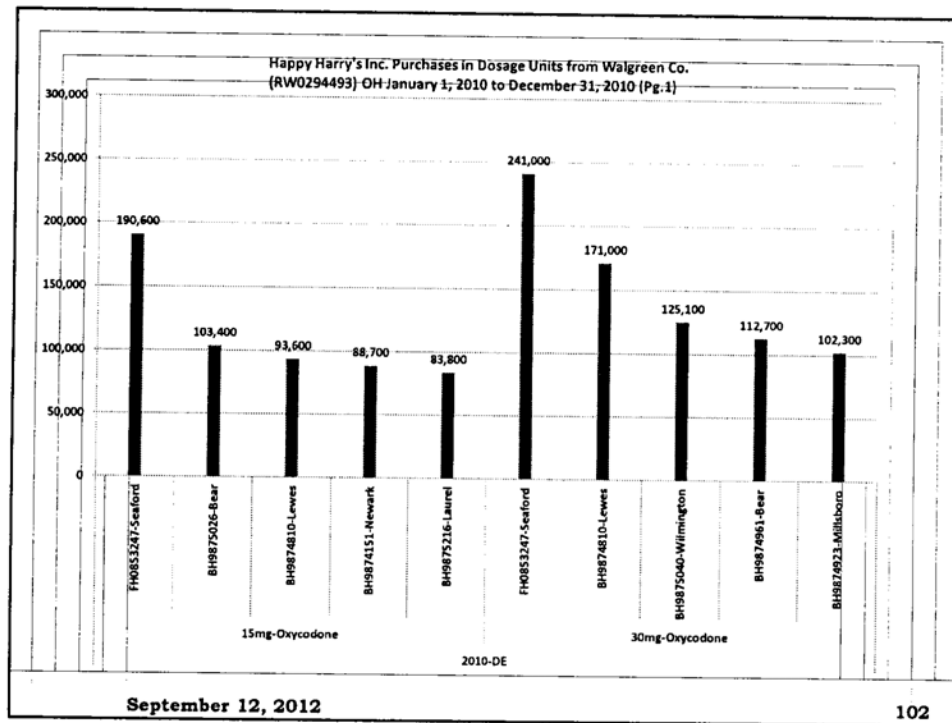












Suggested Questions a Distributor should ask prior to shipping controlled substances.

This list of questions is not intended to be all inclusive nor should it be interpreted that every situation or registrant activity is covered. This questionnaire is provided to assist the distributor to formulate a better understanding of who their customers are and whether or not they should sell to them controlled substances. It is incumbent upon you, the distributors, to ensure that sales to your customers are for legitimate purposes. It is further incumbent upon you to identify illicit or suspicious activities which may result in the diversion of controlled substances.

The use of this questionnaire should not be construed in any manner to be a mechanism or means that you have fully met the criteria and actions required by 21 USC 823 or other state and federal laws that are applicable.

Possible questions for a pharmacy:

- Does the pharmacy fill prescriptions via the Internet? If so, is the pharmacy registered with the DEA under the Ryan Haight Act?
- Is this a mail order pharmacy (fills prescriptions for insurance, etc.)?
Note: A pharmacist may claim to be mail order pharmacy but may actually be operating as an Internet pharmacy. Do not accept the response to this question at face value.
- Is the pharmacy licensed in all states for which it mails or fills prescriptions?
- Does the pharmacy report to all states that have prescription monitoring programs in which their customers reside and to whom they dispense?
- Does the pharmacy provide services for any specialty customers such as Long Term Health Care, Hospice Centers, Assisted Care Living Facilities, etc.?
- Does the pharmacy have staff or a private firm that solicits practitioners to get more business?
- What is the pharmacy's ratio of controlled vs. non-controlled orders?
- Does the pharmacy order a full variety of controlled substances and are they fairly evenly dispersed? If not, why the disparity?
- What are the hours of operation of the pharmacy?
- Does the pharmacy offer a full assortment of sundries to its customers (e.g., aspirin, snacks, cosmetics, etc.)?
- Does the pharmacy have security guards on the premises? If so, why?
- What methods of payment does the pharmacy accept (cash, insurance, Medicaid, and in what ratios)?
- Who is the pharmacy's primary supplier?
- Does the pharmacy order from other suppliers as well? If so, why and what controlled substances?
- If this is a new account, why does the pharmacy want you to be their supplier?